

EXHIBIT M

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

PACIFIC WATER TECHNOLOGY, LLC,
SPRUCE WATERS INVESTMENTS, LLC,
INDIANA WATER TECHNOLOGY, LLC,
AR WATER SUPPLY, LLC, BLC WATER
COMPANY, LLC, GRANITE STREET
VENTURES, LLC, RUMSON WELLNESS,
LLC, BROWN FAMILY ENTERPRISES,
LLC, KMANDY INVESTMENTS, L.L.C.,
EVER UPWARD, INC., SUN A WY, LLC,
SIRIPI WST, LLC, LIVINGWATER
STATION, LLC, GRAYFIN VENTURES,
LLC, PRASITI WATER INVESTMENTS,
LLC, JBF CONSULTING SERVICES, LLC,
COCO AQUA, LLC, Q & V LLC,
WATERSTATION TECHNOLOGY OF
ROCKVILLE, ARRAVEND, LLC,
FLATLANDS EQUIPMENT, LLC, C&C
INVESTMENT HOLDINGS, LLC, GREAT
OAK WATER, LIMITED LIABILITY
COMPANY, WV WATER TECH, LLC,
KDAWG CRYPTO, LLC, CULMINATE
WATER TECHNOLOGY, LLC, CHUGIT,
LLC, CHAURISHI RETAIL ENTERPRISES,
LLC, PROGRESSIVE PARTNERS, LLC, 210
SA HOLDING, LLC, WST UTAH LLC,
V2S2, LLC, CYBORG HOLDINGS, LLC,
ASH VENDING, LLC, ADVENTURE DONE
RIGHT, LLC, BIG BOY TOOLS LLC,
ROMAN JAROSIEWICZ, ABBY WYATT
GROUP, INC., AIDEN WATERWORKS,
LLC, HOREB WATER SOLUTIONS, LLC,
SILVER OAK H2O, LLC, NS SQ ECO
WATERS, LLC, JK SEVEN LLC, JEFFREY
BROOKE, OED PROPERTIES LLC, JLE
ENTERPRISES, LLC, BE OF SERVICE,
LLC, ETANIA, LLC, NIRA ENTERPRISES,
LLC, FACTS PROPERTY SERVICES, LLC,

Case No.

NOTICE OF REMOVAL

1 IMLSUNSHINE, LLC, REDWATERS, LLC,
 2 STARTER HOLDINGS, LLC, HELMUT
 3 GIEWAT, MAY AUERBACH, ROYAL
 4 RESERVOIRS, LLC, AQUALUX WATER
 5 LLC, RCWSTECH1157, LLC,
 6 COLEWSTECH, LLC, MAJI 8377, LLC,
 7 OAKS WATERSTATION TECH, LLC, SDB
 8 H20, LLC, WST, LLC, HALF FULL
 9 VENDING, LLC, RDWSTECH3594, LLC,
 10 ROSE TRAIL VENTURES, LLC, AND
 11 ROSE TRAIL VENTURES 2, LLC, PRAVIN
 12 THAKKAR JR, KWANSOO LEE, DDS,
 13 TOM ANDERSON, ABBEY ANDERSON,
 14 BRIAN CHU, DDS, LARINA CHU, DAVID
 15 SCHROEDER, SARAH SCHROEDER,
 16 REGINALD FRANKLIN, ANGEL
 17 FRANKLIN, DYLAN ROSS, TAYLOR
 18 ROSS, CODY BISHOP, DAVID BROWN,
 19 KARTHIKA MANDYAM, DAVID
 20 BERANEK, SUSAN PINKERTON,
 21 RADHIKA SIRIPIREDDY, KARL
 22 SCHOENLEBER, JAMES SARTAIN,
 23 NIRUPA KESKAR, JOHN FLACK, TRUNG
 24 NGUYEN, LI LIANG, TAN QUAN
 25 NGUYEN, ASHOKA SHEANH, MATHEW
 26 FELLOWS, CHARLES COGGINS,
 27 THOMAS WAVERSICH, JASON
 BLOUGH, MICHELE BLOUGH, KAREN
 LAVIN, PADMA KANDIKONDA, PAVAN
 KANDIKONDA, JAMES VILT II, BASANT
 KUMAR, RADHIKA KAMALLA, MARC
 HILDEBRAND, DEBRA HILDEBRAND,
 MERRILL STODDARD, DANIELLE
 STODDARD, VENKITA SHARMA,
 TIMOTHY DAILEY, ROBERT HOERY,
 STEFANI HOERY, SEAN DONE, ANNA
 DONE, STERLING DAVIS, MARK
 FLEMING, STACEY FLEMING, BO YANG,
 STEVEN WELLS, DUSTIN BRAEGER,
 NAVANEETH KUMAR, WILLIAM WHITE,
 JEANNETTE WHITE, JEFFREY BROOKE,
 JOSHUA OED, JAMES ESTES, ADRIA
 ESTES, MICHAEL BAILEY, KARTHIGA
 JAYARAM, KARTHIKEYAN
 RAMPRASATH, ARCHAN TLKOTI,
 AASHISH PAREKH, JACOB
 LETOURNEAU, KARLA LETOURNEAU,
 KONDA REDDY GADI, SREELAKSHMI
 SIRIPURAM, JOSHUA LEYKAM, PAIGE
 LEYKAM, HELMUT GIEWAT, DEREN
 FLESHER, DDS, GARY YOUNG, HEIDI
 YOUNG, RONALD COLE, DDS, JAMES
 WALKER, DDS, DUANE OKAMOTO,

NOTICE OF REMOVAL - 2

LANE POWELL PC
 1420 FIFTH AVENUE, SUITE 4200
 P.O. BOX 91302
 SEATTLE, WASHINGTON 98111-9402
 206.223.7000 FAX: 206.223.7107

1 LINDA OKAMOTO, SCOTT BURAU, DDS,
2 BRAD BURAU, DDS, JOSH MCNARY, and
ROBERT DOST, DDS,

3 Plaintiffs,

4 v.

5 RYAN R. WEAR and REBECCA A. SWAIN,
6 CREATIVE TECHNOLOGIES, LLC d/b/a
WATERSTATION TECHNOLOGY, WST
7 FRANCHISE SYSTEMS LLC, WATER
STATION MANAGEMENT, LLC, KEVIN
8 NOONEY and ELIZABETH NOONEY, and
the marital community comprised thereof,
REFRESHING USA, LLC, SUMMIT
9 MANAGEMENT SERVICES, LLC, IDEAL
PROPERTY INVESTMENTS, LLC,
REFRESHING CALIFORNIA L.L.C.,
REFRESHING MONTANA, LLC,
11 REFRESHING MID-ATLANTIC, LLC,
REFRESHING CAROLINES, LLC,
12 REFRESHING GREAT LAKES, LLC,
WATERSTATION FINANCE COMPANY,
13 LLC, REFRESHING GEORGIA, LLC,
CREATIVE TECHNOLOGIES FLORIDA,
14 LLC, REFRESHING FLORIDA, LLC, 2129
ANDREA LANE LLC, 3209 VAN BUREN
15 LLC, ICE & WATER VENDORS, LLC,
IDEAL INDUSTRIAL PARK, LLC, IDEAL
16 AZ PROPERTY INVESTMENTS, LLC, K-2
ACQUISITION, LLC, EMERY
17 DEVELOPMENT, LLC, ARIZONA WATER
VENDORS INCORPORATED, WST AZ
18 PROPERTIES LLC, 1118 VIRGINIA
AVENUE LLC, 11519 SOUTH
19 PETROPARK LLC, TCR PLUMBING, LLC,
3422 W CLARENDON AVE LLC, 1206
20 HEWITT AVE LLC, WATERSTATION
TECHNOLOGY II, LLC, PISTOL, INC.,
21 SMOKEY POINT HOLDINGS, LLC, 602
SOUTH MEAN, LLC, 719 EDEN, LLC, 343
22 GROUP LLC, 4300 FOREST LLC, 70 NO
GARDEN, LLC, 204 NWW LLC,
23 WATERSTATION TECHVENTURE, LLC,
WATER STATION HOLDINGS LLC,
24 WATERSTATION TECHNOLOGY, LLC,
REFRESHING COLORADO LLC,
25 ARIZONA VENDORS INC., GOLDEN
STATE VENDING, LLC, REFRESHING
26 FLORIDA LLC, REFRESHING MIDWEST,
LLC, REFRESHING MIDWEST REAL
ESTATE, LLC, REFRESHING NEW

1 MEXICO, LLC, REFRESHING NEW
2 ENGLAND LLC, REFRESHING TEXAS
3 LLC, REFRESHING OKLAHOMA LLC,
4 REFRESHING WASHINGTON, LLC,
5 SMART SODA HOLDINGS, INC.,
6 VENDPRO, LLC d/b/a ELITEVEND,
7 HARRISON STREET, LLC, 602 SOUTH
8 MEADOW LLC, 8825 LLC, UNIBANK, U &
9 I FINANCIAL CORP., SIMON BAI,
10 STEPHANIE YOON, D. BENJAMIN LEE,
PETER PARK, FIRST FED BANK, FIRST
NORTHWEST BANCORP, NORMAN
TONINA, CRAIG CURTIS, JENNIFER
ZACCARDO, CINDY FINNIE, DANA
BEHAR, MATTEW DEINES, SHERILYN
ANDERSON, GABRIEL GALANDA, LYNN
TERWOERDS, LARRY HOUK,
NORTHWEST FINANCIAL SERVICES,
LLC, and RICHARD WEAR,

11 Defendants.

12 JAMES GROUP Int., LLC,

13 Plaintiff,

14 v.

15 WATER STATION MANAGEMENT, LLC;
16 CREATIVE TECHNOLOGIES, LLC; and
17 RYAN WEAR and his marital community,

18 Defendants.

19 AXIAL TILT, LLC, a Delaware domestic
20 limited liability company, and MOD
HOLDINGS, LLC, a Delaware domestic
limited liability company,

21 Plaintiffs,

22 v.

23 WATERSTATION, LLC, a Washington
24 limited liability company, and RYAN WEAR,
an individual,

25 Defendants.

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27 NOTICE OF REMOVAL - 4

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1 JRC REAL ESTATE III, LLC, a California
2 limited liability company,

3 Plaintiff,

4 v.

5 WATER STATIONS MANAGEMENT, LLC,
a Washington limited liability company,

6 Defendant.

7 PURE WATER VENDING, LLC, a
Washington limited liability company,

8 Plaintiff,

9 v.

10 WATER STATION MANAGEMENT, LLC, a
Washington limited liability company; and
11 WST FRANCHISE SYSTEMS LLC, a
Washington limited liability company; and
12 RYAN WEAR, an individual,

13 Defendants.

14 EMMATOINE LLC, a Florida limited liability
15 company,

16 Plaintiff,

17 v.

18 WATER STATION MANAGEMENT, LLC, a
Washington limited liability company,

19 Defendants.

20 RHINO MANUFACTURING, INC. and
21 RHINO INVESTMENTS, LLC,

22 Plaintiffs,

23 v.

24 CREATIVE TECHNOLOGIES, LLC dba
WATER STATION TECHNOLOGY;
25 WATER STATION MANAGEMENT, LLC,

26 Defendants.

27 NOTICE OF REMOVAL - 5

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1 REX VENTURES LLC, a limited liability
2 company,

3 Plaintiff,

4 v.

5 WST FRANCHISE SYSTEM LLC, a
6 Washington limited liability company;
7 WATER STATION MANAGEMENT, LLC, a
8 Washington limited liability company; and
9 RYAN WEAR, an individual

10 Defendants.

11 DENNIS DEMIRJIAN, an individual,

12 Plaintiff,

13 v.

14 WATER STATION MANAGEMENT, LLC, a
15 Washington limited liability company;
16 CREATIVE TECHNOLOGIES, LLC, a
17 Washington limited liability company;
18 REFRESHING USA, LLC, a Washington
19 limited liability company; IDEAL
20 PROPERTY INVESTMENTS, LLC, a
21 Washington limited liability company;
22 SUMMIT MANAGEMENT SERVICES,
23 LLC, a Washington limited liability company;
24 KEVIN NOONEY, an individual; and RYAN
25 WEAR, an individual,

26 Defendants.

27 TANUSHKA WATER VENDING, LLC, a
28 limited liability company; and AARANA
29 WATER VENDING, LLC, a limited liability
30 company,

31 Plaintiffs,

32 v.

33 RYAN WEAR, an individual, and WATER
34 STATION MANAGEMENT, LLC, a limited
35 liability company in Washington,

36 Defendants.

1 WAKANDA VENTURES, LLC, a New
2 Jersey limited liability company,

3 Plaintiff,

4 v.

5 WATER STATION MANAGEMENT, LLC, a
6 Washington limited liability company; RYAN
7 WEAR, an individual,

8 Defendants.

9 PAUL MARTINCHUK,

10 Plaintiff,

11 v.

12 WATER STATION MANAGEMENT, LLC, a
13 Washington limited liability company; WST
14 FRANCHISE SYSTEM LLC, a Washington
15 limited liability company; CREATIVE
16 TECHNOLOGIES LLC, a Washington limited
liability company; RYAN WEAR and
REBECCA A. SWAIN, and the marital
community comprised thereof; and KEVIN
NOONEY and ELIZABETH NOONEY, and
the marital community comprised thereof,

17 Defendants.

18 TO: Clerk of Court

19 AND TO: The parties and their attorneys of record

20 Defendants First Fed Bank, First Northwest Bancorp, Norman Tonina, Craig Curtis,
21 Jennifer Zaccardo, Cindy Finnie, Dana Behar, Matthew Deines, Sherilyn Anderson, Gabriel
22 Galanda, and Lynn Terwoerds (collectively, the First Fed Defendants), hereby remove to this
23 Court the state-court action described below. The First Fed Defendants state the following grounds
24 for removal:

25 **BACKGROUND**

26 1. Certain plaintiffs filed their complaint in the state court on April 16, 2024. This
27 complaint asserted the claims of only seven plaintiffs, and it did not name the First Fed Defendants.

2. On June 20, 2024, Plaintiffs filed their first amended complaint. The amended complaint named the First Fed Defendants. It also named over 100 additional plaintiffs. A true and correct copy of the First Amended Complaint is attached hereto.

3. The First Fed Defendants were served on July 8, 2024.

4. The complaint alleges violation of the Washington State Securities Act and other state-law claims. Am. Compl.¹ ¶ 1. It alleges that plaintiffs' damages exceed \$76,267,500.

5. Plaintiffs are citizens of various states. *See Am. Compl.* ¶¶ 11–74. Defendants are also citizens of various states. *See id.* ¶¶ 75–141. Further, certain plaintiffs are citizens of states, including Indiana, Rhode Island, and Tennessee, of which no defendant is a citizen. *Compare id.* ¶¶ 13, 44, 16, 26, 35, 74, *with id.* ¶¶ 75–141.

6. On certain plaintiffs' motion, the action in which First Fed Defendants were named was consolidated with 11 other actions. True and correct copies of each of those Complaints are attached hereto. The action in which the First Fed Defendants were named was removable in its own right. It remains removable after being consolidated, and consolidation renders all 12 actions removable.

REMOVAL JURISDICTION

7. Class Action Fairness Act. Congress passed the Class Action Fairness Act (CAFA) “primarily to curb perceived abuses of the class action device.” *United Steel, Paper & Forestry, Rubber, Mfg., Energy, Allied Indus. & Serv. Workers Int’l Union, AFL-CIO, CLC v. Shell Oil Co.*, 602 F.3d 1087, 1090 (9th Cir. 2010). “CAFA provides the federal district courts with “original jurisdiction” to hear a “class action” if the class has more than 100 members, the parties are minimally diverse, and the “matter in controversy exceeds the sum or value of \$5,000,000.” *Standard Fire Ins. Co. v. Knowles*, 568 U.S. 588, 592 (2013). CAFA also provides for removal where the court would have had original jurisdiction. 28 U.S.C. § 1453(b). “[N]o antiremoval

¹ Citations to “Am. Compl.” are to the complaint naming First Fed Defendants. Complaints in the 11 consolidated actions are cited by naming the first listed plaintiff in each complaint.

1 presumption attends cases invoking CAFA, which Congress enacted to facilitate adjudication of
 2 certain class actions in federal court.” *Dart Cherokee Basin Operating Co., LLC v. Owens*, 574
 3 U.S. 81, 89 (2014). Similarly, the forum state defendant rule does not apply under CAFA. *See* 28
 4 U.S.C. § 1332(d)(4)(A)(i)(II); *see also* 28 U.S.C. § 1453(c)(1). A removing defendant may allege
 5 citizenship on information and belief. *Ehrman v. Cox Comm’cns, Inc.*, 932 F.3d 1223, 1227 (9th
 6 Cir. 2019).

7 8. Mass Action. This action is a deemed “class action removable” under CAFA. *See*
 8 28 U.S.C. § 1332(d)(11)(A). This is because it is a “civil action . . . in which monetary relief claims
 9 of 100 or more persons are proposed to be tried jointly on the ground that the plaintiffs’ claims
 10 involve common questions of law or fact.” *Id.* § 1332(d)(11)(B)(1). Each plaintiff’s claims exceed
 11 \$75,000. *See* Am. Compl. ¶ 165. Each plaintiff’s claims also involve common questions of fact
 12 and common questions of law related to allegedly similar transactions with defendants.

13 9. Plaintiffs’ Citizenship. Citizenship of each plaintiff is alleged below. For the
 14 purposes of CAFA, “an unincorporated association shall be deemed to be a citizen of the State
 15 where it has its principal place of business and the State under whose laws it is organized.”
 16 28 U.S.C. § 1332(d)(10). Citizenship of each plaintiff is alleged below. Plaintiffs in the action
 17 naming First Fed Defendants are citizens of Arizona, California, Colorado, Connecticut, Delaware,
 18 Florida, Illinois, Indiana, Kansas, Maryland, Michigan, Minnesota, Nevada, New Jersey, New
 19 York, North Carolina, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina,
 20 Tennessee, Texas, Utah, Virginia, Washington, West Virginia, Wyoming. The 11 consolidated
 21 actions add a plaintiff with Georgia citizenship.

22 10. Defendants’ Citizenship. Citizenship of each defendant is alleged below.
 23 Defendants named alongside First Fed Defendants are citizens of Arizona, California, Colorado,
 24 Delaware, Florida, Georgia, Illinois, Indiana, Montana, New Hampshire, New Mexico, North
 25 Carolina, Ohio, Pennsylvania, Texas, Washington, Wyoming. The 11 consolidated actions do not
 26 add defendants with additional states of citizenship.

27 11. Minimal Diversity. The court has jurisdiction when “any member of a class of
 NOTICE OF REMOVAL - 9

1 plaintiffs is a citizen of a State different from any defendant.” 28 U.S.C. § 1332(d)(2)(A). This
 2 minimal diversity is met because plaintiffs are citizens of various states, and defendants are also
 3 citizens of various states. Further, certain plaintiffs are citizens of Indiana, Rhode Island, and
 4 Tennessee, of which no defendant is a citizen. *Compare id.* ¶¶ 13, 44, 16, 26, 35, 74, *with id.* ¶¶ 75–
 5 141.

6 12. Amount in Controversy. “The amount in controversy is simply an estimate of the
 7 total amount in dispute, not a prospective assessment of defendant’s liability” or a concession of
 8 liability. *Lewis v. Verizon Commc’ns, Inc.*, 627 F.3d 395, 400 (9th Cir. 2010). CAFA’s amount in
 9 controversy requirement is satisfied because the aggregate claims of the putative class members
 10 exceed \$5,000,000. 28 U.S.C. § 1332(d)(6). The amended complaint in the action naming First
 11 Fed Defendants alleges that the aggregate investments of Plaintiffs totaled over \$76,000,000, and
 12 claims that damages sustained by Plaintiffs exceed this amount. Am. Compl. ¶¶ 165–66. Thus, the
 13 amount in controversy greatly exceeds the \$5,000,000 threshold. Further, the claims of individual
 14 plaintiffs in the action in which First Fed Defendants are named exceed \$75,000. *See* Am. Compl.
 15 ¶ 165. The consolidation of 11 other actions only increases the amount in controversy.

16 13. Exceptions to Jurisdiction. CAFA provides certain exceptions to jurisdiction.
 17 *Serrano v. 180 Connect, Inc.*, 478 F.3d 1018, 1024 (9th Cir. 2007). “The well-established rule that
 18 the party seeking remand must prove the applicability of such exception governs with equal force
 19 in the context of CAFA as with the general removal statute.” *Id.* In any case, no such exception
 20 exists. First, there is no basis for the court to exercise discretion to decline jurisdiction because far
 21 fewer than one-third of the plaintiffs (in both the action in which First Fed Defendants are named
 22 and in all 12 actions consolidated) are Washington citizens. *See* 28 U.S.C. § 1332(d)(3). Second,
 23 and for this same reason, there is no requirement for the court to decline jurisdiction. *See id.*
 24 § 1332(d)(4). Third, none of the exceptions in 28 U.S.C. § 1453(d) apply. Each of these exceptions
 25 requires that an action “solely” involve a certain subject matter. Because the amended complaint
 26 naming First Fed Defendants does not “solely” concern the enumerated subject matter, neither the
 27 action in which First Fed Defendants is named nor the consolidated action “solely” concerns this

1 subject matter. The first § 1453(d) exception concerns securities defined as “covered securities” in
 2 15 U.S.C. § 77p(f)(3) and 15 U.S.C. § 78bb(f)(5)(E). Both these sections in turn refer to 15 U.S.C.
 3 § 77(r)(b)(1)–(2). The first component of the § 77(r)(b) definition concerns “security listed on a
 4 national stock exchange.” *Cyan, Inc. v. Beaver Cnty. Emp.’s Ret. Fund*, 583 U.S. 416, 423 (2018);
 5 *see also See Katz v. Gerardi*, 552 F.3d 558, 562–63 (7th Cir. 2009). The second component of the
 6 § 77(r)(b) definition concerns securities “issued by an investment company that is registered, or
 7 that has filed a registration statement, under the Investment Company Act of 1940.” 15 U.S.C.
 8 § 77p(b)(2). The Investment Company Act of 1940 concerns mutual funds. *See Northstar Fin.*
 9 *Advisors, Inc. v. Schwab Investments*, 615 F.3d 1106, 1109 (“The ICA was the counterpart in the
 10 area of mutual fund regulation to the Securities Act of 1933 and the Securities Exchange Act of
 11 1934 . . .”). The amended complaint nowhere alleges that any supposed securities were listed on
 12 a national stock exchange or were issued by mutual funds or similar investment companies.
 13 Instead, it alleges that the supposed securities were unregistered. *See, e.g.*, Am. Compl. ¶ 194. The
 14 case therefore does not “solely” concern securities covered by the first § 1453(d) exception. The
 15 second § 1453(d) exception concerns “the internal affairs or governance of a corporation or other
 16 form of business enterprise.” 28 U.S.C. § 1453(d)(2). The amended complaint alleges nowhere
 17 any claim related to corporate governance. It does not “solely” relate to this subject. The third
 18 § 1453(d) exception concerns “rights, duties, or obligations created by or pursuant to a security.”
 19 *Eminence Investors, L.L.L.P. v. Bank of N.Y. Mellon*, 782 F.3d 504, 506 (9th Cir. 2015). This
 20 exception does not apply. To begin, the amended complaint concerns franchise agreements and
 21 loans, neither of which are securities under the tests set out in *Securities & Exchange Commission*
 22 *v. Howey*, 328 U.S. 293 (1946), and *Reves v. Ernest & Young*, 494 U.S. 56 (1990), and therefore
 23 not securities within the meaning of 15 U.S.C. § 77b(a)(1), whose definition is referenced in
 24 § 1453(d)(3). Further, the exception does not apply to claims asserting plaintiffs’ rights as
 25 purchasers, rather than holders of supposed securities. *Eminence Inv’rs, LLLP v. Bank of N.Y.*
 26 *Mellon*, 782 F.3d 504, 508 (9th Cir. 2015). The amended complaint repeatedly alleges as a basis
 27 for its claims circumstances surrounding the offer and sale of the supposed securities. For example,

1 the amended complaint alleges, “Defendants made false representations and/or nondisclosures
 2 through words and/or conduct that were material to, and induced Plaintiffs’ decisions to invest as
 3 applicable.” Am. Compl. ¶ 235; *see also, e.g., id.* ¶¶ 199, 207, 215, 221, 224, 228, 235. It therefore
 4 does not “solely” relate to duties *created* by a security.

5 **PROCEDURAL REQUIREMENTS**

6 14. **CAFA Procedures.** CAFA eliminates certain procedural requirements for removal.
 7 There is no forum state defendant rule under CAFA, and no other defendant need consent to a
 8 removal under CAFA. *See* 28 U.S.C. § 1453(b).

9 15. **Removal is timely.** Plaintiffs served the First Fed Defendants on July 8, 2024. This
 10 Notice of Removal is filed within 30 days of that date. *See* 28 U.S.C. § 1446(b).

11 16. **Venue.** This Court is in the judicial district and division embracing Snohomish
 12 County, Washington, where the state-court case was brought and is pending. Thus, it is the proper
 13 district court for removal. *See* 28 U.S.C. § 1446(a).

14 17. **Notice.** Concurrently with the filing of this Notice of Removal, Defendants are
 15 giving written notice of Removal to Plaintiffs and filing a copy of this Notice of Removal with the
 16 Clerk of the Snohomish County Superior Court, pursuant to 28 U.S.C. § 1446(d).

17 18. **Pleadings and Process.** A copy of the complaint, process, and orders served upon
 18 the First Fed Defendants are attached as Attachments A, B, C, D, and E. 28 U.S.C. § 1446(a). Also
 19 attached are a certificate of service listing all counsel and pro se parties who have appeared in the
 20 action and a civil cover sheet. LCR 101(b). Attached as Attachments F, G, H, I, J, K, L, M, N, O,
 21 P, and Q are complaints in the consolidated actions, as well as a jury demand filed in one of them.
 22 No other jury demand has been filed.

23 19. **Additional Records.** True and complete copies of additional records and
 24 proceedings on file in the state court will be submitted in accordance with Local Civil Rule 101(c).

25 **PLAINTIFFS’ CITIZENSHIP**

26 20. Pacific Water Technology LLC is alleged to be registered in Washington and
 27 owned by a Washington resident. Am. Compl. ¶ 11. According to the Washington Secretary of
 NOTICE OF REMOVAL - 12

1 State, it is organized under the laws of Washington and has its principal office in Puyallup,
 2 Washington. On information and belief, it is a citizen of Washington.

3 21. Spruce Waters Investments, LLC is alleged to be registered in Florida and owned
 4 by a Florida resident. Am. Compl. ¶ 12. According to the Florida Secretary of State, it is organized
 5 under the laws of Florida and has its principal office in Naples, Florida. On information and belief,
 6 Spruce Waters Investments, LLC is a citizen of Florida.

7 22. Indiana Water Technology, LLC is alleged to be registered in Indiana and owned
 8 by an Indiana resident. Am. Compl. ¶ 13. According to the Indiana Secretary of State, it is organized
 9 under the laws of Indiana and has its principal office in Indianapolis, Indiana. On information and belief,
 10 it is a citizen of Indiana.

11 23. AR Water Supply, LLC is alleged to be registered in Texas and owned by a New
 12 York resident. Am. Compl. ¶ 14. According to the Texas Secretary of State, it is organized under
 13 the laws of Texas and has an address in Frisco, Texas. On information and belief, it is a citizen of
 14 Texas.

15 24. BLC Water Company, LLC is alleged to be registered in Nevada and owned by a
 16 California resident. Am. Compl. ¶ 15. According to the Nevada Secretary of State, it is organized
 17 under the laws of Nevada and has an address in Las Vegas, Nevada. On information and belief, it
 18 is a citizen of Nevada.

19 25. Granite Street Ventures, LLC is alleged to be registered in Rhode Island and owned
 20 by a Tennessee resident. Am. Compl. ¶ 16. According to the Rhode Island Secretary of State, it is organized
 21 under the laws of Rhode Island and has its principal office in Franklin, Tennessee. On information and belief, it
 22 is a citizen of Rhode Island and Tennessee.

23 26. Rumson Wellness, LLC is alleged to be registered in New Jersey and owned by a
 24 New York resident. Am. Compl. ¶ 17. Rumson Wellness is organized under the laws of New
 25 Jersey and has an address in Rumson, New Jersey.² On information and belief, it is a citizen of
 26

27 ² Certain secretaries of state provide a principal office address, while others provide only an
 NOTICE OF REMOVAL - 13

1 New Jersey.

2 27. Brown Family Enterprises, LLC is alleged to be registered in Oregon and owned
 3 by an Oregon resident. Am. Compl. ¶ 18. According to the Oregon Secretary of State, it is
 4 organized under the laws of Oregon and has its principal office in Salem, Oregon. On information
 5 and belief, it is a citizen of Oregon.

6 28. Kmandy Investments, LLC is alleged to be registered in Texas and owned by a
 7 Texas resident. Am. Compl. ¶ 19. According to the Texas Secretary of State, it is organized under
 8 the laws of Texas and has an address in McKinney, Texas. On information and belief, it is a citizen
 9 of Texas.

10 29. Ever Upward, Inc. is alleged to be registered in Virginia and owned by a Virginia
 11 resident. Am. Compl. ¶ 20. It is incorporated in Virginia and, according to the Virginia Secretary
 12 of State, has its principal office in Las Vegas, Nevada. On information and belief, it is a citizen of
 13 Virginia and Nevada.

14 30. Sun A WY, LLC is alleged to be registered in Wyoming and owned by a Florida
 15 resident. Am. Compl. ¶ 21. According to the Wyoming Secretary of State, it is organized under
 16 the laws of Wyoming and has its principal office in Cape Coral, Florida. On information and belief,
 17 it is a citizen of Wyoming and Florida.

18 31. Siripi WST, LLC is alleged to be registered in Texas and owned by a Texas
 19 resident. Am. Compl. ¶ 22. According to the Texas Secretary of State, it is organized under the
 20 laws of Texas and has an office in Frisco, Texas. On information and belief, it is a citizen of Texas.

21 32. LivingWater Station, LLC is alleged to be registered in South Carolina and owned
 22 by a South Carolina resident. Am. Compl. ¶ 23. According to the South Carolina Secretary of
 23 State, it is organized under the laws of South Carolina. According to other research, it has an
 24 address in Saint Helena Island, South Carolina. On information and belief, it is a citizen of South
 25 Carolina.

26 address for an office, without indicating whether it is the principal office.

1 33. Grayfin Ventures LLC is alleged to be registered in Texas and owned by a Texas
 2 resident. Am. Compl. ¶ 24. According to the Texas Secretary of State, it is organized under the
 3 laws of Texas and it has an address in Lewisville, Texas. On information and belief, it is a citizen
 4 of Texas.

5 34. Prasiti Water Investments, LLC is alleged to be owned by a Texas resident. Am.
 6 Compl. ¶ 25. The amended complaint does not allege where it is registered. According to the Texas
 7 Secretary of State, it is organized under the laws of Texas and it has an address in McKinney,
 8 Texas. On information and belief, it is a citizen of Texas.

9 35. JBF Consulting Services, LLC is alleged to be registered in Tennessee and owned
 10 by a Tennessee resident. Am. Compl. ¶ 26. According to the Tennessee Secretary of State, it is
 11 organized under the laws of Tennessee and it has its principal office in Germantown, Tennessee.
 12 On information and belief, it is a citizen of Tennessee.

13 36. Coco Aqua, LLC is alleged to be registered in Texas and owned by a Texas resident.
 14 Am. Compl. ¶ 27. According to the Texas Secretary of State, it is organized under the laws of
 15 Texas and has an address in Sugarland, Texas. On information and belief, it is a citizen of Texas.

16 37. Q & V LLC, Waterstation Technology of Rockville is alleged to be registered in
 17 Maryland and owned by a Maryland resident. Am. Compl. ¶ 66. According to the Maryland
 18 Secretary of State, it is organized under the laws of Maryland and it has its principal office in
 19 Rockville, Maryland. On information and belief, it is a citizen of Maryland.

20 38. Arravend, LLC is alleged to be registered in Wyoming and owned by a Virginia
 21 resident. Am. Compl. ¶ 28. According to the Wyoming Secretary of State, it is organized under
 22 the laws of Wyoming and it has its principal office in Sheridan, Wyoming. On information and belief,
 23 it is a citizen of Wyoming.

24 39. Flatlands Equipment, LLC is alleged to be registered in Kansas and owned by a
 25 Kansas resident. Am. Compl. ¶ 29. According to the Kansas Secretary of State, it is organized
 26 under the laws of Kansas and has its principal office in Wichita, Kansas. On information and belief,
 27 it is a citizen of Kansas.

1 40. C&C Investment Holdings, LLC is alleged to be registered in North Carolina and
 2 owned by a North Carolina resident. Am. Compl. ¶ 30. According to the North Carolina Secretary
 3 of State, it is organized under the laws of North Carolina and it has its principal office in Raleigh,
 4 North Carolina. On information and belief, it is a citizen of North Carolina.

5 41. Great Oak Water, Limited Liability Company is alleged to be registered in Texas
 6 and owned by a Texas resident. Am. Compl. ¶ 31. According to the Texas Secretary of State, it is
 7 organized under the laws of Texas and it has an office in Allen, Texas. On information and belief,
 8 it is a citizen of Texas.

9 42. WV Water Tech, LLC is alleged to be registered in West Virginia and owned by a
 10 West Virginia resident. Am. Compl. ¶ 32. According to the West Virginia Secretary of State, it is
 11 organized under the laws of West Virginia and it has its principal office in Shepherdstown, West
 12 Virginia. On information and belief, it is a citizen of West Virginia.

13 43. Kdawg Crypto, LLC is alleged to be registered in Connecticut and owned by a
 14 Connecticut resident. Am. Compl. ¶ 33. According to the Connecticut Secretary of State, it is
 15 organized under the laws of Connecticut and it has its principal office in Milford, Connecticut. On
 16 information and belief, it is a citizen of Connecticut.

17 44. Culminate Water Technology, LLC is alleged to be registered in Virginia and
 18 owned by a Virginia resident. Am. Compl. ¶ 34. According to the Virginia Secretary of State, it
 19 has its principal office in Ashburn, Virginia. According to other research, it is organized under the
 20 laws of Virginia. On information and belief, it is a citizen of Virginia.

21 45. ChugIt, LLC is alleged to be registered in Florida and owned by a Tennessee
 22 resident. Am. Compl. ¶ 35. According to the Florida Secretary of State, it is organized under the
 23 laws of Florida and it has its principal office in St. George, Utah. On information and belief, it is
 24 a citizen of Florida and Utah.

25 46. Chaurishi Retail Enterprises, LLC is alleged to be registered in Oregon and owned
 26 by an Oregon resident. Am. Compl. ¶ 36. According to the Oregon Secretary of State, it is
 27 organized under the laws of Oregon and it has its principal office in Portland, Oregon. On

1 information and belief, it is a citizen of Oregon.

2 47. Progressive Partners, LLC is alleged to be registered in Virginia and owned by a
 3 Virginia resident. Am. Compl. ¶ 37. According to the Virginia Secretary of State, it has its
 4 principal office in Chantilly, Virginia. According to other research, it is organized under the laws
 5 of Virginia. On information and belief, it is a citizen of Virginia.

6 48. 210 SA Holding, LLC is alleged to be registered in Texas and owned by a Texas
 7 resident. Am. Compl. ¶ 38. According to the Texas Secretary of State, it is organized under the
 8 laws of Texas and it has an address in San Antonio, Texas. On information and belief, it is a citizen
 9 of Texas.

10 49. WST Utah LLC is alleged to be registered in Utah and owned by a Utah resident.
 11 Am. Compl. ¶ 39. According to the Utah Secretary of State, it is organized under the laws of Utah
 12 and it has its principal office in Kaysville, Utah. On information and belief, it is a citizen of Utah.

13 50. V2S2, LLC is alleged to be registered in Colorado and owned by a Colorado
 14 resident. Am. Compl. ¶ 40. According to the Colorado Secretary of State, it is organized under the
 15 laws of Colorado and it has its principal office in Littleton, Colorado. On information and belief,
 16 it is a citizen of Colorado.

17 51. Cyborg Holdings, LLC is alleged to be registered in Washington and owned by an
 18 Arizona resident. Am. Compl. ¶ 41. According to the Arizona Corporation Commission, it is
 19 organized under the laws of Arizona and has its principal office in Phoenix, Arizona. On
 20 information and belief, and notwithstanding the amended complaint allegation, it is a citizen of
 21 Arizona.

22 52. ASH Vending, LLC is alleged to be registered in Colorado and owned by a
 23 Colorado resident. Am. Compl. ¶ 42. According to the Colorado Secretary of State, it is organized
 24 under the laws of Colorado and it has its principal office in Highlands Ranch, Colorado. On
 25 information and belief, it is a citizen of Colorado.

26 53. Adventure Done Right, LLC is alleged to be registered in Utah and owned by a
 27 Utah resident. Am. Compl. ¶ 43. According to the Utah Secretary of State, it is organized under

1 the laws of Utah and it has an address in Salt Lake City, Utah. On information and belief, it is a
 2 citizen of Utah.

3 54. Big Boy Tools LLC is alleged to be registered in Ohio and owned by an Indiana
 4 resident. Am. Compl. ¶ 44. According to the Ohio Secretary of State, it is organized under the laws
 5 of Ohio. According to other research, it has an address in Perrysburg, Ohio. On information and
 6 belief, it is a citizen of Ohio.

7 55. Roman Jarosiewicz is alleged to be a Minnesota resident. Am. Compl. ¶ 45. Mr.
 8 Jarosiewicz has an address in Minnesota and is registered to vote in Minnesota. On information
 9 and belief, Mr. Jarosiewicz is a citizen of Minnesota.

10 56. Abby Wyatt Group, Inc. is alleged to be registered in South Carolina and owned by
 11 a South Carolina resident. Am. Compl. ¶ 46. According to the South Carolina Secretary of State,
 12 it is organized under the laws of South Carolina. According to other research, it has an address in
 13 Taylors, South Carolina. On information and belief, it is a citizen of South Carolina.

14 57. Aiden Waterworks, LLC is alleged to be registered in Michigan and owned by a
 15 Michigan resident. Am. Compl. ¶ 47. According to the Michigan Secretary of State, it is organized
 16 under the laws of Michigan. According to other research, it has an address in Northville, Michigan.
 17 On information and belief, it is a citizen of Michigan.

18 58. Horeb Water Solutions, LLC is alleged to be registered in Maryland and owned by
 19 a Pennsylvania resident. Am. Compl. ¶ 48. According to the Maryland Secretary of State, it is organized
 20 under the laws of Maryland and it has its principal office in Elkridge, Maryland. On
 21 information and belief, it is a citizen of Maryland.

22 59. Silver Oak H2O, LLC is alleged to be registered in Colorado and owned by a
 23 Colorado resident. Am. Compl. ¶ 49. According to the Colorado Secretary of State, it is organized
 24 under the laws of Colorado and it has its principal office in Glenwood Springs, Colorado. On
 25 information and belief, it is a citizen of Colorado.

26 60. NS SQUARE ECO Waters, LLC, named as NS SQ ECO Waters LLC in the caption
 27 of the amended complaint, is alleged to be registered in Illinois and owned by an Illinois resident.

1 Am. Compl. ¶ 50. According to the Illinois Secretary of State, it is organized under the laws of
 2 Illinois and has its principal office in Aurora, Illinois. On information and belief, it is a citizen of
 3 Illinois.

4 61. JK Seven LLC is alleged to be registered in Delaware and owned by a Texas
 5 resident. Am. Compl. ¶ 51. According to the Delaware Secretary of State, it is organized under the
 6 laws of Delaware. According to other research, it has an address in Wilmington, Delaware. On
 7 information and belief, it is a citizen of Delaware.

8 62. Oed Properties LLC is alleged to be registered in Texas and owned by a Texas
 9 resident. Am. Compl. ¶ 53. According to the Texas Secretary of State, it is organized under the
 10 laws of Texas and it has an address in The Woodlands, Texas. On information and belief, it is a
 11 citizen of Texas.

12 63. JLE Enterprises, LLC is alleged to be registered in Colorado and owned by a
 13 Colorado resident. Am. Compl. ¶ 54. According to the Colorado Secretary of State, it is organized
 14 under the laws of Colorado and it has its principal office in Castle Rock, Colorado. On information
 15 and belief, it is a citizen of Colorado.

16 64. Be of Service, LLC is alleged to be registered in Wyoming and owned by a Texas
 17 resident. Am. Compl. ¶ 55. According to the Texas Secretary of State, it is organized under the
 18 laws of Texas and it has an address in Las Vegas, Nevada. On information and belief, it is a citizen
 19 of Texas and Nevada.

20 65. Etania, LLC is alleged to be registered in Colorado and owned by a Colorado
 21 resident. Am. Compl. ¶ 56. According to the Colorado Secretary of State, it is organized under the
 22 laws of Colorado and it has its principal office in Denver, Colorado. On information and belief, it
 23 is a citizen of Colorado.

24 66. Nira Enterprises, LLC is alleged to be registered in Texas and owned by a Texas
 25 resident. Am. Compl. ¶ 57. According to the Texas Secretary of State, it is organized under the
 26 laws of Texas and it has an address in Plano, Texas. On information and belief, it is a citizen of
 27 Texas.

1 67. Facts Property Services, LLC is alleged to be registered in Arizona and owned by
 2 an Arizona resident. Am. Compl. ¶ 58. According to the Arizona Corporation Commission, it is
 3 organized under the laws of Arizona and has an address in Phoenix, Arizona. On information and
 4 belief, it is a citizen of Arizona.

5 68. IMLSunshine, LLC is alleged to be registered in Kansas and owned by a Kansas
 6 resident. Am. Compl. ¶ 59. According to the Kansas Secretary of State, it is organized under the
 7 laws of Kansas and it has its principal office in Lawrence, Kansas. On information and belief, it is
 8 a citizen of Kansas.

9 69. Redwaters, LLC is alleged to be registered in Illinois and owned by an Illinois
 10 resident. Am. Compl. ¶ 60. According to the Illinois Secretary of State, it is organized under the
 11 laws of Illinois and it has its principal office in Naperville, Illinois. On information and belief, it
 12 is a citizen of Illinois.

13 70. Starter Holdings, LLC is alleged to be registered in Arizona and owned by an
 14 Arizona resident. Am. Compl. ¶ 61. According to the Arizona Corporation Commission, it is
 15 organized under the laws of Arizona and it has an address in Phoenix, Arizona. On information and
 16 belief, it is a citizen of Arizona.

17 71. Helmut Giewat is alleged to be a Florida resident. Am. Compl. ¶ 62. A search for
 18 public records about Mr. Giewat indicate that he is deceased. Nonetheless, on the basis of the
 19 amended complaint, Mr. Giewat is, on information and belief, a citizen of Florida.

20 72. May Auerbach is alleged to be a California resident. Am. Compl. ¶ 63. Ms.
 21 Auerbach has a California address. On information and belief, Ms. Auerbach is a citizen of
 22 California.

23 73. Todd Auerbach is not named in the caption of the amended complaint, but he is
 24 alleged to be California resident. Am. Compl. ¶ 63. Mr. Auerbach has a California address and is
 25 licensed to practice dentistry in California. On information and belief, Mr. Auerbach is a citizen
 26 of California.

27 74. Royal Reservoirs, LLC is alleged to be registered in Oklahoma and owned by an

1 Oklahoma resident. Am. Compl. ¶ 64. According to the Oklahoma Secretary of State, it is
 2 organized under the laws of Oklahoma. According to other research, it has an address in Edmond,
 3 Oklahoma. On information and belief, it is a citizen of Oklahoma.

4 75. Aqualux Water LLC is alleged to be registered in Texas and owned by a Texas
 5 resident. Am. Compl. ¶ 65. According to the Texas Secretary of State, it is organized under the
 6 laws of Texas and it has an address in Southlake, Texas. On information and belief, it is a citizen
 7 of Texas.

8 76. RCWSTECH1157, LLC is alleged to be registered in Illinois and owned by an
 9 Illinois resident. Am. Compl. ¶ 67. According to the Illinois Secretary of State, it is organized
 10 under the laws of Illinois and it has its principal office in Decatur, Illinois. On information and
 11 belief, it is a citizen of Illinois.

12 77. COLEWSTECH, LLC is alleged to be registered in Illinois and owned by an
 13 Illinois resident. Am. Compl. ¶ 67. According to the Illinois Secretary of State, it is organized
 14 under the laws of Illinois and it has its principal office in Decatur, Illinois. On information and
 15 belief, it is a citizen of Illinois.

16 78. Maji 8377, LLC is alleged to be registered in Michigan and owned by a Michigan
 17 resident. Am. Compl. ¶ 68. According to the Michigan Secretary of State, it is organized under the
 18 laws of Michigan and it has an address in Grand Blanc, Michigan. On information and belief, it is
 19 a citizen of Michigan.

20 79. Oaks Waterstation Tech, LLC is alleged to be registered in Wyoming and owned
 21 by a Washington resident. Am. Compl. ¶ 69. According to the Washington Secretary of State, it is
 22 organized under the laws of Washington and has its principal office in Sammamish, Washington.
 23 On information and belief, it is a citizen of Washington.

24 80. SDB H20, LLC is alleged to be registered in Florida and owned by a Florida
 25 resident. Am. Compl. ¶ 70. According to the Florida Secretary of State, it is organized under the
 26 laws of Florida and it has its principal office in Nokomis, Florida. On information and belief, it is
 27 a citizen of Florida.

1 81. WST, LLC is alleged to be registered in Florida and owned by a Florida resident.
 2 Am. Compl. ¶ 71. According to the Florida Secretary of State, it is organized under the laws of
 3 Florida and it has its principal office in Nokomis, Florida. On information and belief, it is a citizen
 4 of Florida.

5 82. Half Full Vending, LLC is alleged to be registered in Texas and owned by a Texas
 6 resident. Am. Compl. ¶ 72. According to the Texas Secretary of State, it is organized under the
 7 laws of Texas and it has an address in Rosenberg, Texas. On information and belief, it is a citizen
 8 of Texas.

9 83. RDWSTECH3594, LLC is alleged to be registered in Michigan and owned by a
 10 Michigan resident. Am. Compl. ¶ 73. According to the Michigan Secretary of State, it is organized
 11 under the laws of Michigan. According to other research, it has an address in Lexington, Michigan.
 12 On information and belief, it is a citizen of Michigan.

13 84. Rose Trail Ventures, LLC is alleged to be registered in Tennessee and owned by a
 14 Tennessee Resident. Am. Compl. ¶ 74. According to the Tennessee Secretary of State, it is
 15 organized under the laws of Tennessee and it has its principal office in Memphis, Tennessee. On
 16 information and belief, it is a citizen of Tennessee.

17 85. Rose Trail Ventures 2, LLC is alleged to be registered in Tennessee and owned by
 18 a Tennessee resident. Am. Compl. ¶ 74. According to the Tennessee Secretary of State, it is
 19 organized under the laws of Tennessee and it has its principal office in Memphis, Tennessee. On
 20 information and belief, it is a citizen of Tennessee.

21 86. Pravin Thakkar Jr. is alleged to be a Tennessee resident. Am. Compl. ¶ 74. Mr.
 22 Thakkar has an address in Tennessee and a vehicle registered in Tennessee. On information and
 23 belief, he is a citizen of Tennessee.

24 87. Dr. Kwansoo Lee is alleged to be a Washington resident. Am. Compl. ¶ 11. Mr.
 25 Lee has a Washington address and is licensed to practice dentistry in Washington. On information
 26 and belief, Mr. Lee is a citizen of Washington.

27 88. Tom Anderson is alleged to be a Florida resident. Am. Compl. ¶ 12. Mr. Anderson

1 has a Florida address and is registered to vote in Florida. On information and belief, Mr. Anderson
 2 is a citizen of Florida.

3 89. Abbey Anderson is alleged to be a Florida resident. Am. Compl. ¶ 12. Ms.
 4 Anderson has a Florida address and is registered to vote in Florida. On information and belief, Ms.
 5 Anderson is a citizen of Florida.

6 90. Dr. Brian Chu is alleged to be a California resident. Am. Compl. ¶ 15. Dr. Chu has
 7 a California address and is licensed to practice dentistry in California. On information and belief,
 8 Dr. Brian Chu is a citizen of California.

9 91. Dr. Larina Chu is alleged to be a California resident. Am. Compl. ¶ 15. Dr. Chu has
 10 a California address and is licensed to practice dentistry in California. On information and belief,
 11 Dr. Larina Chu is a citizen of California.

12 92. David Schroeder is alleged to be an Indiana resident. Am. Compl. ¶ 13. Mr.
 13 Schroeder has an Indiana address and is registered to vote in Indiana. On information and belief,
 14 Mr. Schroeder is a citizen of Indiana.

15 93. Sarah Schroeder is alleged to be an Indiana resident. Am. Compl. ¶ 13. Ms.
 16 Schroeder has an Indiana address and is registered to vote in Indiana. On information and belief,
 17 Ms. Schroeder is a citizen of Indiana.

18 94. Reginald Franklin is alleged to be a New York resident. Am. Compl. ¶ 14. Mr.
 19 Franklin has a New York address but has a Texas driver's license and is registered to vote in Texas.
 20 On information and belief, Mr. Franklin is a citizen of Texas.

21 95. Angel Franklin is alleged to be a New York resident. Am. Compl. ¶ 14. Ms.
 22 Franklin has a New York address but has a Texas driver's license and is registered to vote in Texas.
 23 On information and belief, Ms. Franklin is a citizen of Texas.

24 96. Dylan Ross is alleged to be a New York resident. Am. Compl. ¶ 17. Mr. Ross has
 25 a New York address and is registered to vote in New York. On information and belief, Mr. Dylan
 26 Ross is a citizen of New York.

27 97. Taylor Ross is alleged to be a New York resident. Am. Compl. ¶ 17. Mr. Ross has

1 a New Jersey address and is registered to vote in New York. On information and belief, Mr. Taylor
2 Ross is a citizen of New Jersey.

3 98. Cody Bishop is alleged to be a Tennessee resident. Am. Compl. ¶ 16. Mr. Bishop
4 has a Tennessee address and a vehicle registered in Tennessee. On information and belief, Mr.
5 Bishop is a citizen of Tennessee.

6 99. David Brown is alleged to be an Oregon resident. Am. Compl. ¶ 18. Mr. Brown has
7 an Oregon address. On information and belief, Mr. Brown is a citizen of Oregon.

8 100. Karthika Mandyam is alleged to be a Texas resident. Am. Compl. ¶ 19. Ms.
9 Mandyam has a Texas address and a vehicle registered in Texas. On information and belief, Ms.
10 Mandyam is a citizen of Texas.

11 101. David Beranek is alleged to be a Virginia resident. Am. Compl. ¶ 20. Mr. Baranek
12 has a Virginia address and is licensed as a pilot with a Virginia address. On information and belief,
13 Mr. Baranek is a citizen of Virginia.

14 102. Susan Pinkerton is alleged to be a Florida resident. Am. Compl. ¶ 21. Ms. Pinkerton
15 has a Florida address and is registered to vote in Florida. On information and belief, she is a citizen
16 of Florida.

17 103. Radhika Siripireddy is alleged to be a Texas resident. Am. Compl. ¶ 22. Ms.
18 Siripireddy has a Texas address and is registered to vote in Texas. On information and belief, Ms.
19 Siripireddy is a citizen of Texas.

20 104. Karl Schoenleber is alleged to be a South Carolina resident. Am. Compl. ¶ 23. Mr.
21 Schoenleber has a South Carolina address and is registered to vote in South Carolina. On
22 information and belief, Mr. Schoenleber is a citizen of South Carolina.

23 105. James Sartain is alleged to be a Texas resident. Am. Compl. ¶ 24. Mr. Sartain has
24 a Texas address and is registered to vote in Texas. On information and belief, Mr. Sartain is a
25 citizen of Texas.

26 106. Nirupa Keskar is alleged to be a Texas resident. Am. Compl. ¶ 25. Ms. Keskar has
27 a Texas address and is registered to vote in Texas. On information and belief, Ms. Keskar is a

1 citizen of Texas.

2 107. John Flack is alleged to be a Tennessee resident. Am. Compl. ¶ 26. Mr. Flack has
 3 a Tennessee address and a vehicle registered in Tennessee. On information and belief, Mr. Flack
 4 is a citizen of Tennessee.

5 108. Trung Nguyen is alleged to be a Texas resident. Am. Compl. ¶ 27. Mr. Nguyen has
 6 a Texas address and is registered to vote in Texas. On information and belief, Mr. Nguyen is a
 7 citizen of Texas.

8 109. Li Liang is alleged to be a Texas resident. Am. Compl. ¶ 27. Ms. Liang has a Texas
 9 address and is registered to vote in Texas. On information and belief, Ms. Liang is a citizen of
 10 Texas.

11 110. Tan Quan Nguyen is alleged to be a Maryland resident. Am. Compl. ¶ 66. Mr.
 12 Nguyen has a Maryland address. On information and belief, Mr. Nguyen is a citizen of Maryland.

13 111. Ashoka Sheanh is alleged to be a Virginia resident. Am. Compl. ¶ 28. Mr. Sheanh
 14 has a Virginia address. On information and belief, Mr. Sheanh is a citizen of Virginia.

15 112. Mathew Fellows is alleged to be a Kansas resident. Am. Compl. ¶ 29. Mr. Fellows
 16 has a Kansas address. On information and belief, Mr. Fellows is a citizen of Kansas.

17 113. Charles Coggins is alleged to be a North Carolina resident. Am. Compl. ¶ 30. Mr.
 18 Coggins has a North Carolina address. On information and belief, Mr. Coggins is a citizen of North
 19 Carolina.

20 114. Thomas Wawersich is alleged to be a Texas resident. Am. Compl. ¶ 31. Mr.
 21 Wawersich has a Texas address and is registered to vote in Texas. On information and belief, Mr.
 22 Wawersich is a citizen of Texas.

23 115. Jason Blough is alleged to be a West Virginia resident. Am. Compl. ¶ 32. Mr.
 24 Blough has a West Virginia address and is registered to vote in West Virginia. On information and
 25 belief, Mr. Blough is a citizen of West Virginia citizen.

26 116. Michele Blough is alleged to be a West Virginia resident. Am. Compl. ¶ 32. Ms.
 27 Blough has a West Virginia address and is registered to vote in West Virginia. On information and

1 belief, Ms. Blough is a citizen of West Virginia.

2 117. Karen Lavin is alleged to be a Connecticut resident. Am. Compl. ¶ 33. Ms. Lavin
3 has a Connecticut address. On information and belief, Ms. Lavin is a citizen of Connecticut.

4 118. Padma Kandikonda is alleged to be a Virginia resident. Am. Compl. ¶ 34. Ms.
5 Kandikonda has a Virginia address. On information and belief, Ms. Kandikonda is a citizen of
6 Virginia.

7 119. Pavan Kandikonda is alleged to be a Virginia resident. Am. Compl. ¶ 34. Mr.
8 Kandikonda has a Virginia address. On information and belief, Mr. Kandikonda is a citizen of
9 Virginia.

10 120. James Vilt II is alleged to be a Tennessee resident. Am. Compl. ¶ 35. Mr. Vilthas a
11 Tennessee address and has a vehicle registered in Tennessee. On information and belief, Mr. Vilt
12 is a citizen of Tennessee.

13 121. Basant Kumar is alleged to be an Oregon resident. Am. Compl. ¶ 36. Mr. Kumar
14 has an Oregon address. On information and belief, Mr. Kumar is a citizen of Oregon.

15 122. Radhika Kamalla is alleged to be a Virginia resident. Am. Compl. ¶ 37. Ms.
16 Kamalla has a Virginia address. On information and belief, Ms. Kamalla is a citizen of Virginia.

17 123. Marc Hildebrand is alleged to be a Texas resident. Am. Compl. ¶ 38. Mr.
18 Hildebrand has a Texas address and is registered to vote in Texas. On information and belief, Mr.
19 Hildebrand is a citizen of Texas.

20 124. Debra Hildebrand is alleged to be a Texas resident. Am. Compl. ¶ 38. Ms.
21 Hildebrand has a Texas address and is registered to vote in Texas. On information and belief, Ms.
22 Hildebrand is a citizen of Texas.

23 125. Merrill Stoddard is alleged to be a Utah resident. Am. Compl. ¶ 39. Mr. Stoddard
24 has a Utah address and is registered to vote in Utah. On information and belief, Mr. Stoddard is a
25 citizen of Utah.

26 126. Danielle Stoddard is alleged to be a Utah resident. Am. Compl. ¶ 39. Ms. Stoddard
27 has a Utah address and is registered to vote in Utah. On information and belief, Ms. Stoddard is a

1 citizen of Utah.

2 127. Venkita Sharma is alleged to be a Colorado resident. Am. Compl. ¶ 40. Mr. Sharma
3 has a Colorado address and is registered to vote in Colorado. On information and belief, Mr.
4 Sharma is a citizen of Colorado.

5 128. Timothy Dailey is alleged to be an Arizona resident. Am. Compl. ¶ 41. Mr. Dailey
6 has an Arizona address. On information and belief, Mr. Dailey is a citizen of Arizona.

7 129. Robert Hoery is alleged to be a Colorado resident. Am. Compl. ¶ 42. Mr. Hoery
8 has a Colorado address and is registered to vote in Colorado. On information and belief, Mr. Hoery
9 is a citizen of Colorado.

10 130. Stefani Hoery is alleged to be a Colorado resident. Am. Compl. ¶ 42. Ms. Hoery
11 has a Colorado address and is registered to vote in Colorado. On information and belief, Ms. Hoery
12 is a citizen of Colorado.

13 131. Sean Done is alleged to be a Utah resident. Am. Compl. ¶ 43. Mr. Done has a Utah
14 address and is registered to vote in Utah. On information and belief, Mr. Done is a citizen of Utah.

15 132. Anna Done is alleged to be a Utah resident. Am. Compl. ¶ 43. Ms. Done has a Utah
16 address and is registered to vote in Utah. On information and belief, Ms. Done is a citizen of Utah.

17 133. Sterling Davis is alleged to be an Indiana resident. Am. Compl. ¶ 44. Mr. Davis has
18 an Indiana address and is registered to vote in Indiana. On information and belief, Mr. Davis is a
19 citizen of Indiana.

20 134. Mark Fleming is alleged to be a South Carolina resident. Am. Compl. ¶ 46. Mr.
21 Fleming has a South Carolina address and is registered to vote in South Carolina. On information
22 and belief, Mr. Fleming is a citizen of South Carolina.

23 135. Stacey Fleming is alleged to be a South Carolina resident. Am. Compl. ¶ 46. Ms.
24 Fleming has a South Carolina address and is registered to vote in South Carolina. On information
25 and belief, Ms. Fleming is a citizen of South Carolina.

26 136. Bo Yang is alleged to be a Michigan resident. Am. Compl. ¶ 47. Mr. Yang has a
27 Michigan address and is registered to vote in Michigan. On information and belief, Mr. Yang is a

1 citizen of Michigan.

2 137. Steven Wells is alleged to be a Pennsylvania resident. Am. Compl. ¶ 48. Mr. Wells
 3 has a Pennsylvania address and is registered to vote in Pennsylvania. On information and belief,
 4 Mr. Wells is a citizen of Pennsylvania.

5 138. Dustin Braeger is alleged to be a Colorado resident. Am. Compl. ¶ 49. Mr. Braeger
 6 has a Colorado address and is registered to vote in Colorado. On information and belief, Mr.
 7 Braeger is a citizen of Colorado.

8 139. Navaneeth Kumar is alleged to be an Illinois resident. Am. Compl. ¶ 50. Mr. Kumar
 9 has an Illinois address and a vehicle that is registered in Illinois. On information and belief, Mr.
 10 Kumar is a citizen of Illinois.

11 140. William White is alleged to be a Texas resident. Am. Compl. ¶ 51. Mr. White has
 12 a Texas address and is registered to vote in Texas. On information and belief, he is a citizen of
 13 Texas.

14 141. Jeannette White is alleged to be a Texas resident. Am. Compl. ¶ 51. Ms. White has
 15 a Texas address and is registered to vote in Texas. On information and belief, Ms. White is a citizen
 16 of Texas.

17 142. Jeffrey Brooke, listed twice in the caption of the amended complaint, is alleged to
 18 be an Illinois resident. Am. Compl. ¶ 52. Mr. Brooke has an Illinois address. On information and
 19 belief, Mr. Brooke is a citizen of Illinois.

20 143. Joshua Oed is alleged to be a Texas resident. Am. Compl. ¶ 53. Mr. Oed has a Texas
 21 address and is registered to vote in Texas. On information and belief, Mr. Oed is a citizen of Texas.

22 144. James Estes is alleged to be a Colorado resident. Am. Compl. ¶ 54. Mr. Estes has a
 23 Colorado address and is registered to vote in Colorado. On information and belief, Mr. Estes is a
 24 citizen of Colorado.

25 145. The complaint does not contain an allegation as to the residency of Adria Estes but
 26 lists her in the caption. Ms. Estes has a Colorado address and she is registered to vote in Colorado.
 27 On information and belief, Ms. Estes is a citizen of Colorado.

1 146. Michael Bailey is alleged to be a Texas resident. Am. Compl. ¶ 55. Mr. Bailey has
 2 a Tennessee address and a Tennessee driver's license. On information and belief, notwithstanding
 3 the allegation in the complaint, Mr. Bailey is a citizen of Tennessee.

4 147. Karthiga Jayaram is alleged to be a Colorado resident. Am. Compl. ¶ 56. Ms.
 5 Jayaram has a Colorado address and a vehicle that is registered in Colorado. On information and
 6 belief, Ms. Jayaram is a citizen of Colorado.

7 148. Karthikeyan Ramprasath is alleged to be a Colorado resident. Am. Compl. ¶ 56.
 8 Mr. Ramprasath has a Colorado address and a vehicle registered in Colorado. On information and
 9 belief, Mr. Ramprasath is a citizen of Colorado.

10 149. Archan Tikoti is alleged to be a Texas resident. Am. Compl. ¶ 57. Mr. Tikoti has a
 11 Texas address and he is registered to vote in Texas. On information and belief, Mr. Tikoti is a
 12 citizen of Texas.

13 150. Aashish Parekh is alleged to be an Arizona resident. Am. Compl. ¶ 58. Mr. Parekh
 14 has an Arizona address. On information and belief, Mr. Parekh is a citizen of Arizona.

15 151. Dr. Jacob Letourneau is alleged to be a Kansas resident. Am. Compl. ¶ 59. Dr.
 16 Letourneau has a Kansas address and a license to practice optometry in Kansas. On information
 17 and belief, he is a citizen of Kansas.

18 152. Karla Letourneau is alleged to be a Kansas resident. Am. Compl. ¶ 59. Ms.
 19 Letourneau has a Kansas address and has a vehicle registered in Kansas. On information and belief,
 20 she is a citizen of Kansas.

21 153. Konda Reddy Gadi is alleged to be an Illinois resident. Am. Compl. ¶ 60. Mr. Gadi
 22 has an Illinois address and has a vehicle registered in Illinois. On information and belief, Mr. Gadi
 23 is a citizen of Illinois.

24 154. Sreelakshmi Siripuram is alleged to be an Illinois resident. Am. Compl. ¶ 60. Ms.
 25 Siripuram has an Illinois address. On information and belief, Mr. Siripuram is a citizen of Illinois.

26 155. Joshua Leykam is alleged to be an Arizona resident. Am. Compl. ¶ 61. Mr. Leykam
 27 has an Arizona address. On information and belief, Mr. Leykam is a citizen of Arizona.

1 156. Paige Leykam is alleged to be an Arizona resident. Am. Compl. ¶ 61. Ms. Leykam
 2 has an Arizona address and is licensed as a nurse practitioner in Arizona. On information and
 3 belief, Ms. Leykam is a citizen of Arizona.

4 157. Dr. Deren Flesher is alleged to be an Oklahoma resident. Am. Compl. ¶ 64. Dr.
 5 Flesher has an Oklahoma address and he is registered to vote in Oklahoma. On information and
 6 belief, Dr. Flesher is a citizen of Oklahoma.

7 158. Gary Young is alleged to be a Texas resident. Am. Compl. ¶ 65. Mr. Young has a
 8 Texas address and is registered to vote in Texas. On information and belief, Mr. Young is a citizen
 9 of Texas.

10 159. The Complaint makes no allegations regarding Heidi Young's residency but lists
 11 her in the caption. Ms. Young has a Texas address and is registered to vote in Texas. On
 12 information and belief, Ms. Young is a citizen of Texas.

13 160. Dr. Ronald Cole is alleged to be an Illinois resident. Am. Compl. ¶ 67. Dr. Cole has
 14 an Illinois address and has a license to practice dentistry in Illinois. On information and belief, Dr.
 15 Cole is a citizen of Illinois.

16 161. Dr. James Walker is alleged to be a Michigan resident. Am. Compl. ¶ 68. Mr
 17 Walker has a Michigan address and he is licensed to practice medicine in Michigan. On
 18 information and belief, Mr. Walker is a citizen of Michigan.

19 162. Duane Okamoto is alleged to be a Washington resident. Am. Compl. ¶ 69. Mr.
 20 Okamoto has a Washington address. On information and belief, Mr. Okamoto is a citizen of
 21 Washington.

22 163. Linda Okamoto is alleged to be a Washington resident. Am. Compl. ¶ 69. Ms.
 23 Okamoto has a Washington address. On information and belief, Ms. Okamoto is a citizen of
 24 Washington.

25 164. Dr. Scott Burau is alleged to be a Florida resident. Am. Compl. ¶ 70. Dr. Burau has
 26 a Michigan address and is licensed to practice dentistry in Michigan. On information and belief,
 27 Dr. Scott Burau is a citizen of Michigan.

1 165. Dr. Brad Burau is alleged to be a Florida resident. Am. Compl. ¶ 71. Dr. Burau has
 2 a Florida address and is registered to vote in Florida. On information and belief, Dr. Burau is a
 3 citizen of Florida.

4 166. Josh McNary is alleged to be a Texas resident. Am. Compl. ¶ 72. Mr. McNary has
 5 a Texas address and a vehicle registered in Texas. On information and belief, Mr. McNary is a
 6 citizen of Texas.

7 167. Dr. Robert Dost is alleged to be a Michigan resident. Am. Compl. ¶ 73. Dr. Dost
 8 has a Michigan address. On information and belief, Dr. Dost is a citizen of Michigan.

9 168. James Group Int, LLC is alleged to be a Nevada limited liability company. James
 10 Group Compl. ¶ 1.1. According to the Nevada Secretary of State, it is organized under the laws of
 11 Nevada and has an address in Carson City, Nevada. On information and belief, it is a citizen of
 12 Nevada.

13 169. Axial Tilt, LLC is alleged to be a Delaware limited liability company. Axial Tilt
 14 Compl. ¶ 1. According to the Delaware Secretary of State, it is organized under the laws of
 15 Delaware. On information and belief, it is a citizen of Delaware.

16 170. Mod Holdings, LLC is alleged to be a Delaware limited liability company. Axial
 17 Tilt Compl. ¶ 2. According to the Delaware Secretary of State, it is organized under the laws of
 18 Delaware and according to other research, it has an address in Lewes, Delaware. On information
 19 and belief, it is a citizen of Delaware.

20 171. JRC Real Estate III, LLC is alleged to be a California limited liability company.
 21 JRC Real Estate Compl. ¶ 2. According to the California Secretary of State, it is organized under
 22 the laws of California and has its principal office in Queen Creek, Arizona. On information and
 23 belief, it is a citizen of California and Arizona.

24 172. Pure Water Vending is alleged to be a Washington limited liability company. Pure
 25 Water Vending Compl. ¶ 1. According to the Washington Secretary of State, it is organized under
 26 the laws of Washington and it has its principal office in Spokane, Washington. On information and
 27 belief, it is a citizen of Washington.

1 173. Emmatoine, LLC is alleged to be a Florida limited liability company. Emmatoine
 2 Compl. ¶ 1.1. According to the Florida Secretary of State, it is organized under the laws of Florida
 3 and it has its principal office in Bradenton, Florida. On information and belief, it is a citizen of
 4 Florida.

5 174. Rhino Manufacturing, Inc. is alleged to be a Washington corporation. Rhino
 6 Manufacturing Compl. ¶ 1. According to the Washington Secretary of State, it is incorporated in
 7 Washington and it has its principal office in Monroe, Washington. On information and belief, it is
 8 a citizen of Washington.

9 175. Rhino Investments, LLC is alleged to be Oregon limited liability company. Rhino
 10 Manufacturing Compl. ¶ 2. According to the Oregon Secretary of State, it is organized under the
 11 laws of Oregon and it has an address in Powell Butte, Oregon. On information and belief, it is a
 12 citizen of Oregon.

13 176. Rex Ventures, LLC is alleged to be a Colorado limited liability company. Rex
 14 Ventures Compl. ¶ 1.1. According to the Colorado Secretary of State, it is organized under the
 15 laws of Colorado and it has its principal office in Arvada, Colorado. On information and belief, it
 16 is a citizen of Colorado.

17 177. Dennis Demirjian is alleged to be a resident of Florida. Demirjian Compl. ¶ 1. Dr.
 18 Demirjian has a Florida address and is licensed to practice dentistry in Florida. On information
 19 and belief, Dr. Demirjian is a citizen of Florida.

20 178. Tanushka Water Vending LLC is alleged to be a Georgia limited liability company.
 21 Tanushka Water Vending Compl. ¶ 1. According to the Georgia Secretary of State, it is organized
 22 under the laws of Georgia and it has its principal office in College Park, Georgia. On information
 23 and belief, it is a citizen of Georgia.

24 179. Aarana Water Vending is alleged to be a California limited liability company.
 25 Tanushka Water Vending Compl. ¶ 1. According to the California Secretary of State, it is
 26 organized under the laws of California and it has its principal office in Fremont, California. On
 27 information and belief, it is a citizen of California.

180. Wakanda Ventures is alleged to be a New Jersey limited liability company. Wakanda Ventures Compl. ¶ 1. According to public records, it is organized under the laws of New Jersey and it has an address in Jersey City, New Jersey. On information and belief, it is a citizen of New Jersey.

181. Paul Martinchuk is alleged to be a resident of California. Martinchuk Compl. ¶ 1.1. Mr. Martinchuk has a California address. On information and belief, Mr. Martinchuk is a citizen of California.

DEFENDANTS' CITIZENSHIP

182. Ryan R. Wear is alleged to reside and conduct business in Snohomish County, Washington. Am. Compl. ¶ 75; James Group Compl. ¶ 1.4; Pure Water Vending Compl. ¶ 4; Demirjian Compl. ¶ 8; Tanushka Water Vending Compl. ¶ 2; Wakanda Ventures Compl. ¶ 3; Martinchuk Compl. ¶ 1.5. Mr. Wear has a Washington address. On information and belief, Mr. Wear is a citizen of Washington.

183. Rebecca A. Swain is alleged to reside in Snohomish County, Washington. Am. Compl. ¶ 75; Martinchuk Compl. ¶ 1.5. Ms. Swain has a Washington address. On information and belief, Ms. Swain is a citizen of Washington.

184. Creative Technologies, LLC d/b/a Waterstation Technology is alleged to engage in business activities in Snohomish County, Washington. Am. Compl. ¶ 76; James Group Compl. ¶ 1.3; Rhino Manufacturing Compl. ¶ 3; Demirjian Compl. ¶ 3; Martinchuk Compl. ¶ 1.4. According to the Washington Secretary of State, it is organized under the laws of Washington and it has its principal office in Everett, Washington. On information and belief, it is a citizen of Washington.

185. WST Franchise Systems LLC is alleged to be registered in Washington and owned by a Washington resident. Am. Compl. ¶ 77; Pure Water Vending Compl. ¶ 3; Rex Ventures Compl. ¶ 1.2; Martinchuk Copml. ¶ 1.3. According to the Washington Secretary of State, it is organized under the laws of Washington and it has its principal office in Everett, Washington. On information and belief, it is a citizen of Washington.

1 186. Water Station Management, LLC, incorrectly named in the Axial Tilt complaint as
 2 "WaterStation, LLC," is alleged to be registered in Washington and owned by a Washington
 3 resident. Am. Compl. ¶ 78; James Group Compl. ¶ 1.2; Axil Tilt Compl. ¶ 3; JRC Real Estate
 4 Compl. ¶ 3; Pure Water Vending Compl. ¶ 2; Emmatoine Compl. ¶ 1.2; Rhino Manufacturing
 5 Compl. ¶ 4; Rex Ventures Compl. ¶ 1.3; Demirjian Compl. ¶ 2; Tanushka Water Vending Compl.
 6 ¶ 2; Wakanda Ventures Compl. ¶ 2; Martinchuk Compl. ¶ 1.2. According to the Washington
 7 Secretary of State, it is organized under the laws of Washington and it has its principal office in
 8 Everett, Washington. On information and belief, it is a citizen of Washington.

9 187. Kevin Nooney is alleged to be a Washington resident and to conduct business in
 10 Snohomish County, Washington. Am. Compl. ¶ 79; Demirjian Compl. ¶ 7; Martinchuk Compl.
 11 ¶ 1.10. Mr. Nooney has a Washington address. On information and belief, Mr. Nooney is a citizen
 12 of Washington.

13 188. Elizabeth Nooney is alleged to be a Washington resident. Am. Compl. ¶ 79;
 14 Martinchuk Compl. ¶ 1.10. Ms. Nooney has a Washington address. On information and belief, Ms.
 15 Nooney is a citizen of Washington.

16 189. Refreshing USA LLC is alleged to engage in business activities in Snohomish
 17 County. Am. Compl. ¶ 80; Demirjian Compl. ¶ 4. According to the Washington Secretary of State,
 18 it is organized under the laws of Washington and it has its principal office in Everett, Washington.
 19 On information and belief, it is a citizen of Washington.

20 190. Summit Management Services, LLC is alleged to engage in business activities in
 21 Snohomish County. Am. Compl. ¶ 81; Demirjian Compl. ¶ 6. According to the Washington
 22 Secretary of State, it is organized under the laws of Washington and it has its principal office in
 23 Everett, Washington. On information and belief, it is a citizen of Washington.

24 191. Ideal Property Investments, LLC is alleged to engage in business activities in
 25 Snohomish County. Am. Compl. ¶ 82; Demirjian Compl. ¶ 5. According to the Washington
 26 Secretary of State, it is organized under the laws of Washington and it has its principal office in
 27 Everett, Washington. On information and belief, it is a citizen of Washington.

1 192. Refreshing California LLC is alleged to engage in business activities in Snohomish
 2 County. Am. Compl. ¶ 83. According to the California Secretary of State, it is organized under the
 3 laws of California and it has its principal office in Indio, California. On information and belief, it
 4 is a citizen of California.

5 193. Refreshing Montana, LLC is alleged to engage in business activities in Snohomish
 6 County. Am. Compl. ¶ 84. According to the Montana Secretary of State, it is organized under the
 7 laws of Montana and it has its principal office in Missoula Montana. On information and belief, it
 8 is a citizen of Montana.

9 194. Refreshing Mid-Atlantic, LLC is alleged to engage in business activities in
 10 Snohomish County. Am. Compl. ¶ 85. According to the Pennsylvania Secretary of State, it is
 11 organized under the laws of Pennsylvania. According to other research, it has a Pennsylvania
 12 address. On information and belief, it is a citizen of Pennsylvania.

13 195. Refreshing Carolinas, LLC is alleged to engage in business activities in Snohomish
 14 County. Am. Compl. ¶ 86. According to the North Carolina Secretary of State, it is organized
 15 under the laws of North Carolina and it has its principal office in Everett, Washington. On
 16 information and belief, it is a citizen of North Carolina and Washington.

17 196. Refreshing Great Lakes, LLC is alleged to engage in business activities in
 18 Snohomish County. Am. Compl. ¶ 87. According to the Illinois Secretary of State, it is organized
 19 under the laws of Illinois and it has its principal office in Elk Grove Village, Illinois. On
 20 information and belief, it is a citizen of Illinois.

21 197. WaterStation Finance Company, LLC is alleged to engage in business activities in
 22 Snohomish County. Am. Compl. ¶ 88. According to the Washington Secretary of State, it is
 23 organized under the laws of Washington and it has its principal office in Everett, Washington. On
 24 information and belief, it is a citizen of Washington.

25 198. Refreshing Georgia, LLC is alleged to engage in business activities in Snohomish
 26 County. Am. Compl. ¶ 89. According to the Georgia Secretary of State, it is organized under the
 27 laws of Georgia and it has its principal office in Marietta, Georgia. On information and belief, it

1 is a citizen of Georgia.

2 199. Creative Technologies Florida, LLC is alleged to engage in business activities in
 3 Snohomish County. Am. Compl. ¶ 90. According to the Florida Secretary of State, Creative
 4 Technologies Florida, LLC is a trade name of Creative Technologies, LLC which is a Washington
 5 LLC. According to the Washington Secretary of State, Creative Technologies, LLC is organized
 6 under the laws of Washington and has its principal office in Everett, Washington. *See also supra*
 7 ¶ 184. On information and belief, Creative Technologies Florida, LLC is merely a trade name for
 8 a citizen of Washington and not an unincorporated association whose citizenship must be
 9 separately alleged.

10 200. Refreshing Florida, LLC is alleged to engage in business activities in Snohomish
 11 County. Am. Compl. ¶ 91. According to the Florida Secretary of State, it is organized under the
 12 laws of Florida and it has its principal office in Fort Myers, Florida. On information and belief, it
 13 is a citizen of Florida.

14 201. 2129 Andrea Lane LLC is alleged to engage in business activities in Snohomish
 15 County. Am. Compl. ¶ 92. According to the Wyoming Secretary of State, it is formed under the
 16 laws of Wyoming and it has its principal office in Jackson, Wyoming. On information and belief,
 17 it is a citizen of Wyoming.

18 202. 3209 Van Buren LLC is alleged to engage in business activities in Snohomish
 19 County. Am. Compl. ¶ 93. According to the Wyoming Secretary of State, it is formed under the
 20 laws of Wyoming and it has its principal office in Jackson, Wyoming. On information and belief,
 21 it is a citizen of Wyoming.

22 203. Ice & Water Vendors, LLC is alleged to engage in business activities in Snohomish
 23 County. Am. Compl. ¶ 95. According to the Arizona Corporation Commission, it is formed under
 24 the laws of Arizona and it has its principal office in Apache Junction, Arizona. On information
 25 and belief, it is a citizen of Arizona.

26 204. Ideal Industrial Park, LLC is alleged to engage in business activities in Snohomish
 27 County. Am. Compl. ¶ 96. According to the Wyoming Secretary of State, it is organized under the

1 laws of Wyoming and it has its principal office in Jackson, Wyoming. On information and belief,
 2 it is a citizen of Wyoming.

3 205. Ideal AZ Property Investments, LLC is alleged to engage in business activities in
 4 Snohomish County. Am. Compl. ¶ 97. According to the Arizona Corporations Commission, Ideal
 5 AZ Property Investments, LLC is the fictitious name for Ideal Property Investments, LLC, *see*
 6 *supra* ¶ 191, a Washington citizen. On information and belief, Ideal AZ Property Investments,
 7 LLC is not an unincorporated association whose citizenship must be separately alleged.

8 206. K-2 Acquisition, LLC is alleged to engage in business activities in Snohomish
 9 County. Am. Compl. ¶ 98. According to the Washington Secretary of State, it is organized under
 10 the laws of Washington and it has its principal office in Everett, Washington. On information and
 11 belief, it is a citizen of Washington.

12 207. Emery Development, LLC is alleged to engage in business activities in Snohomish
 13 County. Am. Compl. ¶ 99. According to the Washington Secretary of State, it is organized under
 14 the laws of Washington and it has its principal office in Everett, Washington. On information and
 15 belief, it is a citizen of Washington.

16 208. Arizona Water Vendors Incorporated is alleged to be a limited liability company
 17 owned by a Washington resident. According to the Arizona Corporation Commission, it is a
 18 corporation incorporated in Arizona and has an office in Apache Junction, Arizona. On
 19 information and belief, it is a citizen of Arizona.

20 209. WST AZ Properties LLC is alleged to engage in business activities in Snohomish
 21 County. Am. Compl. ¶ 101. According to the Arizona Corporation Commission, it is organized
 22 under the laws of Arizona and it has a Washington address. On information and belief, it is a citizen
 23 of Washington and Arizona.

24 210. 1118 Virginia Street LLC, named in the case caption as 1118 Virginia Avenue LLC
 25 but described in the body as 1118 Virginia Street, is alleged to engage in business activities in
 26 Snohomish County. Am. Compl. ¶ 102. According to the Washington Secretary of State, it is
 27 organized under the laws of Washington and it has its principal office in Everett, Washington. On

1 information and belief, it is a citizen of Washington.

2 211. 11519 South Petropark LLC is alleged to engage in business activities in
3 Snohomish County. Am. Compl. ¶ 103. According to the Washington Secretary of State, it is
4 organized under the laws of Washington and it has its principal office in Houston, Texas. On
5 information and belief, it is a citizen of Washington and Texas.

6 212. TCR Plumbing, LLC is alleged to engage in business activities in Snohomish
7 County. Am. Compl. ¶ 104. According to the Arizona Corporation Commission, it is organized
8 under the laws of Arizona and it has an address in Everett, Washington. On information and belief,
9 it is a citizen of Arizona and Washington.

10 213. 3422 W Clarendon Ave LLC is alleged to engage in business activities in
11 Snohomish County. Am. Compl. ¶ 105. According to the Wyoming Secretary of State, it is
12 organized under the laws of Wyoming and its principal office is in Jackson, Wyoming. On
13 information and belief, it is a citizen of Wyoming.

14 214. 1206 Hewitt Ave LLC is alleged to engage in business activities in Snohomish
15 County. Am. Compl. ¶ 106. According to the Washington Secretary of State, it is organized under
16 the laws of Washington and it has its principal office in Everett, Washington. On information and
17 belief, it is a citizen of Washington.

18 215. Waterstation Technology II, LLC is alleged to engage in business activities in
19 Snohomish County. Am. Compl. ¶ 107. According to the Wyoming Secretary of State, it is
20 organized under the laws of Wyoming and has its principal office in Everett, Washington. On
21 information and belief, it is a citizen of Wyoming and Washington.

22 216. Pistol, Inc. is alleged to be a Wyoming corporation. Am. Compl. ¶ 108. According
23 to the Wyoming Secretary of State, it is incorporated in Wyoming and has its principal office in
24 Jackson, Wyoming. On information and belief, it is a citizen of Wyoming.

25 217. Smokey Point Holdings, LLC is alleged to engage in business activities in
26 Snohomish County. Am. Compl. ¶ 109. According to the Wyoming Secretary of State, it is
27 organized under the laws of Wyoming and has its principal office in Jackson, Wyoming. On

1 information and belief, it is a citizen of Wyoming.

2 218. 602 South Meadow, LLC is alleged to engage in business activities in Snohomish
 3 County. Am. Compl. ¶ 111. According to the Wyoming Secretary of State, it is formed under the
 4 laws of Wyoming and it has its principal office in Jackson, Wyoming. On information and belief,
 5 it is a citizen of Wyoming.

6 219. 719 Eden, LLC is alleged to engage in business activities in Snohomish County and
 7 to be owned, operated, and controlled by Defendant Ryan Wear. Am. Compl. ¶ 110. Public records
 8 searches do not reveal its state of organization or principal place of business. Public records
 9 searches do reveal that a company named 701 Eden is organized under the laws of North Carolina
 10 and it has its principal office in Jackson, Wyoming. Nonetheless, on the basis of the amended
 11 complaint and on information and belief, 719 Eden, LLC is a citizen of Washington.

12 220. 343 Group LLC is named in the caption of the amended complaint, *see* Am. Compl.
 13 at 3–4, but not in the body of the amended complaint. “Group, LLC” is named in the body of the
 14 amended complaint and is alleged to engage in business activities in Snohomish County and to be
 15 owned, operated, and controlled by Defendant Ryan Wear. Am. Compl. ¶ 112. Public records
 16 searches do not reveal the state of organization or principal place of business of a company by
 17 either name. On information and belief, it is a citizen of Washington where Mr. Ryan Wear is
 18 domiciled.

19 221. 4300 Forest LLC is alleged to engage in business activities in Snohomish County.
 20 Am. Compl. ¶ 113. According to the Wyoming Secretary of State, it is organized under the laws
 21 of Wyoming and it has its principal office in Jackson, Wyoming. On information and belief, it is
 22 a citizen of Wyoming.

23 222. 70 NO Garden, LLC is alleged to engage in business activities in Snohomish
 24 County and to be owned, operated, and controlled by Defendant Ryan Wear. Am. Compl. ¶ 114.
 25 Public records searches do not reveal its state of organization or principal place of business. On
 26 information and belief, it is a citizen of Washington where Mr. Ryan Wear is domiciled.

27 223. 204 NWW LLC is alleged to engage in business activities in Snohomish County.

1 Am. Compl. ¶ 115. According to the Wyoming Secretary of State, it is organized under the laws
 2 of Wyoming and it has its principal office in Jackson, Wyoming. On information and belief, it is
 3 a citizen of Wyoming.

4 224. Waterstation Techventure, LLC is alleged to engage in business activities in
 5 Snohomish County. Am. Compl. ¶ 116. According to the Washington Secretary of State, it has
 6 been voluntarily dissolved, but it was organized under the laws of Washington and it had its
 7 principal office in Everett, Washington. On information and belief, Waterstation Techventure,
 8 LLC is a citizen of Washington.

9 225. Water Station Holdings LLC is alleged to engage in business activities in
 10 Snohomish County. Am. Compl. ¶ 117. According to the Indiana Secretary of State, it is organized
 11 under the laws of Indiana and its principal office is in Indianapolis, Indiana. On information and
 12 belief, it is a citizen of Indiana.

13 226. Waterstation Technology, LLC is alleged to be the trade name of Creative
 14 Technologies, LLC. Am. Compl. ¶ 76. Separately, the amended complaint alleges, “Water Station
 15 Holdings, LLC, WaterStation Technology, LLC, on information and belief, is a limited liability
 16 company owned, operated, and controlled by Defendant Wear that engages in business activities
 17 in Snohomish County.” Am. Compl. ¶ 117. On information and belief, Waterstation Technology,
 18 LLC is the trade name for a citizen of Washington, *see supra* ¶ 184, not an unincorporated
 19 association whose citizenship must be separately alleged.

20 227. Refreshing Colorado LLC is alleged to engage in business activities in Snohomish
 21 County. Am. Compl. ¶ 117. According to the Colorado Secretary of State, it is organized under
 22 the laws of Colorado and its principal office is in Colorado Springs, Colorado. On information and
 23 belief, it is a citizen of Colorado.

24 228. Arizona Water Vendors Inc. (named in the complaint as Arizona Vendors Inc.) is
 25 alleged to be a “limited liability company” and to be owned by a Washington resident. According
 26 to the Arizona Corporation Commission, Arizona Water Vendors, Inc. is incorporated in Arizona
 27 and has its principal office in Everett, Washington. On information and belief, it is a citizen of

1 Washington and Arizona.

2 229. Golden State Vending, LLC is alleged to engage in business activities in Snohomish
 3 County. Am. Compl. ¶ 120. According to the Washington Secretary of State, it is organized under
 4 the laws of Washington and its principal office is in Everett, Washington. On information and
 5 belief, it is a citizen of Washington.

6 230. Refreshing Florida LLC is alleged to engage in business activities in Snohomish
 7 County. Am. Compl. ¶ 121. According to the Florida Secretary of State, it is organized under the
 8 laws of Florida and its principal office is in Fort Myers, Florida. On information and belief, it is a
 9 citizen of Florida.

10 231. Refreshing Midwest, LLC is alleged to engage in business activities in Snohomish
 11 County. Am. Compl. ¶ 122. According to the Indiana Secretary of State, it is pending
 12 administrative dissolution, but it is organized under the laws of Indiana and it has its principal
 13 office in Indianapolis, Indiana. On information and belief, it is a citizen of Indiana.

14 232. Refreshing Midwest Real Estate, LLC is alleged to engage in business activities in
 15 Snohomish County. Am. Compl. ¶ 123. According to the Indiana Secretary of State, it is pending
 16 administrative dissolution, but it is organized under the laws of Indiana and it has its principal
 17 office in Indianapolis, Indiana. On information and belief, it is a citizen of Indiana.

18 233. Refreshing New Mexico, LLC is alleged to engage in business activities in
 19 Snohomish County. Am. Compl. ¶ 124. According to the New Mexico Secretary of State, it is
 20 organized under the laws of New Mexico and it has its principal office in Albuquerque, New
 21 Mexico. On information and belief, it is a citizen of New Mexico.

22 234. Refreshing New England, LLC is alleged to engage in business activities in
 23 Snohomish County. Am. Compl. ¶ 125. According to the New Hampshire Secretary of State, it is
 24 organized under the laws of New Hampshire and it has its principal office in Manchester, New
 25 Hampshire. On information and belief, it is a citizen of New Hampshire.

26 235. Refreshing Texas LLC is alleged to engage in business activities in Snohomish
 27 County. Am. Compl. ¶ 126. According to the Texas Secretary of State, it is organized under the

1 laws of Texas and it has an address in Everett, Washington. On information and belief, it is a
 2 citizen of Texas and Washington.

3 236. Refreshing Oklahoma LLC is alleged to engage in business activities in Snohomish
 4 County and to be owned, operated, and controlled by Defendant Ryan Wear. Am. Compl. ¶ 127.
 5 Public records searches do not reveal its state of organization or principal place of business. On
 6 information and belief, it is a citizen of Washington, where Mr. Ryan Wear is domiciled.

7 237. Refreshing Washington, LLC is alleged to engage in business activities in
 8 Snohomish County. Am. Compl. ¶ 128. According to the Washington Secretary of State, it is
 9 organized under the laws of Washington and it has its principal office in Everett, Washington. On
 10 information and belief, it is a citizen of Washington.

11 238. Smart Soda Holdings, Inc. is alleged to do business in Snohomish County,
 12 Washington and to be owned by a Washington resident. Am. Compl. ¶ 129. According to the
 13 Delaware Secretary of State, it is organized under the laws of Delaware. According to other
 14 research, it has an Ohio address. On information and belief, it is a citizen of Delaware and Ohio.

15 239. Vendpro, LLC d/b/a Elitevend is alleged to do business in Snohomish County,
 16 Washington and to be owned by a Washington resident. Am. Compl. ¶ 130. According to the
 17 Washington Secretary of State, it is organized under the laws of Washington and it has its principal
 18 office in Everett, Washington. On information and belief, it is a citizen of Washington.

19 240. Harrison Street, LLC is alleged to engage in business activities in Snohomish
 20 County. Am. Compl. ¶ 131. According to the Washington Secretary of State, it is organized under
 21 the laws of Washington and it has its principal office in Des Moines, Washington. On information
 22 and belief, it is a citizen of Washington.

23 241. 602 South Mean LLC is alleged to do business in Snohomish County and to be
 24 owned, operated, and controlled by Defendant Ryan Wear. Am. Compl. ¶ 132. Public record
 25 searches do not reveal its state of organization or principal place of business. On information and
 26 belief, it is a citizen of Washington, where Mr. Wear is domiciled.

27 242. The complaint makes no allegations about 8825 LLC. According to the Wyoming

1 Secretary of State, it is formed under the laws of Wyoming and it has its principal office in Jackson,
2 Wyoming. On information and belief, it is a citizen of Wyoming.

3 243. Unibank is alleged to be organized in Washington and to engage in business
4 activities in Snohomish County, Washington. Am. Compl. ¶ 134. According to the Washington
5 Secretary of State, Unibank is incorporated in Washington and has its principal office in
6 Lynnwood, Washington. On information and belief, Unibank is a citizen of Washington.

7 244. U & I Financial Corp. is alleged to be organized under the laws of Washington and
8 to engage in business activities in Snohomish County, Washington. Am. Compl. ¶ 134. According
9 to the Washington Secretary of State, U & I is incorporated in Washington and has its principal
10 office in Lynnwood, Washington. On information and belief, U & I is a citizen of Washington.

11 245. Simon Bai is alleged to be a Washington resident. Am. Compl. ¶ 136. Mr. Bai has
12 a Washington address and a vehicle registered in Washington. On information and belief, Mr. Bai
13 is a citizen of Washington.

14 246. Stephanie Yoon is alleged to be a Washington resident. Am. Compl. ¶ 136. Ms.
15 Yoon has a Washington address. On information and belief, Ms. Yoon is a citizen of Washington.

16 247. D. Benjamin Lee is alleged to be a Washington resident. Am. Compl. ¶ 136. Mr.
17 Lee has a Washington address and a vehicle registered in Washington. On information and belief,
18 Mr. Lee is a citizen of Washington.

19 248. Peter Park is alleged to be a Washington resident. Am. Compl. ¶ 136. Mr. Park has
20 a Washington address. On information and belief, Mr. Park is a citizen of Washington.

21 249. First Fed Bank is incorporated in Washington and has its principal office in Port
22 Angeles, Washington. First Fed Bank is a citizen of Washington.

23 250. First Northwest Bancorp, incorrectly named in the caption as First Northwest
24 Bankcorp, is incorporated in Washington and has its principal office in Port Angeles, Washington.
25 It is a citizen of Washington.

26 251. Norman Tonina is a citizen of Washington.

27 252. Craig Curtis is a citizen of Washington.

1 253. Jennifer Zaccardo is a citizen of Washington.

2 254. Cindy Finnie is a citizen of Washington.

3 255. Dana Behar is a citizen of Washington.

4 256. Matthew Deines is a citizen of Washington.

5 257. Sherilyn Anderson is a citizen of Washington.

6 258. Gabriel Galanda is a citizen of Washington.

7 259. Lynn Terwoerds is a citizen of Washington.

8 260. Larry Houk is alleged to be a Washington resident. Am. Compl. ¶ 141. Mr. Houk
9 has a Washington address. On information and belief, Mr. Houk is a citizen of Washington.

10 261. Northwest Financial Services, LLC is alleged to conduct business in Snohomish
11 County and to be owned and operated by Mr. Houk. Am. Compl. ¶ 141. Public records show no
12 entity called Northwest Financial Services, LLC. Public records show Mr. Houk is associated with
13 a company called Northwest Funding Services, LLC. Nevertheless, based on the amended
14 complaint, and on information and belief, Northwest Financial Services, LLC is a Washington
15 citizen.

16 262. Richard Wear is alleged to be a Washington resident. Am. Compl. ¶ 133. Dr. Wear
17 has a Washington address and a license to practice medicine in Washington. On information and
18 belief, Dr. Wear is a citizen of Washington.

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25 ////

26 ////

27

1 DATED this 1st day of August, 2024.
2
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26 Galanda, and Lynn Terwoerds*
27

CERTIFICATE OF SERVICE

I, Kathryn M. Savaria, hereby certify under penalty of perjury of the laws of the State of Washington that on the 1st day of August, 2024, I caused to be served a copy of the foregoing **NOTICE OF REMOVAL** via U.S. Mail and electronic mail, on the following person(s) at the following address(es):

Pacific Water Technology v. Ryan Wear, et al. Case No. 24-2-2887-31

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10	Spruce Waters Investments, LLC	Spruce Waters Investments, LLC
11	Indiana Water Technology, LLC	Indiana Water Technology, LLC
12	AR Water Supply, LLC	AR Water Supply, LLC
13	BLC Water Company, LLC	BLC Water Company, LLC
14	Granite Street Ventures, LLC	Granite Street Ventures, LLC
15	Rumson Wellness, LLC	Rumson Wellness, LLC
16	Brown Family Enterprises, LLC	Brown Family Enterprises, LLC
17	Kmandy Investments, LLC	Kmandy Investments, LLC
18	Ever Upward, Inc.	Ever Upward, Inc.
19	Sun A Wy, LLC	Sun A Wy, LLC
20	Siripi WST, LLC	Siripi WST, LLC
21	Livingwater Station, LLC	Livingwater Station, LLC
22	Grayfin Ventures, LLC	Grayfin Ventures, LLC
23	Prasiti Water Investments, LLC	Prasiti Water Investments, LLC
24	JBF Consulting Services, LLC	JBF Consulting Services, LLC
25	Coco Aqua, LLC	Coco Aqua, LLC
26	Q & V LLC, WaterStation Technology of Rockville	Q & V LLC, WaterStation Technology of Rockville
27	Arravend, LLC	Arravend, LLC
	Flatlands Equipment, LLC	Flatlands Equipment, LLC
	C&C Investment Holdings, LLC	C&C Investment Holdings, LLC
	Great Oak Water, Limited Liability Company	Great Oak Water, Limited Liability Company
	WV Water Tech, LLC	WV Water Tech, LLC
	Kdawg Crypto, LLC	Kdawg Crypto, LLC
	Culminate Water Technology, LLC	Culminate Water Technology, LLC
	Chaurishi Retail Enterprises, LLC	Chaurishi Retail Enterprises, LLC
	Progressive Partners, LLC	Progressive Partners LLC
	210 SA Holding, LLC	210 SA Holding, LLC
	WST Utah LLC	WST Utah LLC
	V2S2, LLC	V2S2, LLC
	Cyborg Holdings, LLC	Cyborg Holdings, LLC
	Ash Vending, LLC	Ash Vending, LLC
	Adventure Done Right, LLC	Adventure Done Right, LLC
	Big Boy Tools LLC	Big Boy Tools LLC
	Roman Jarosiewicz	

1	Abby Wyatt Group, Inc.	Roman Jarosiewicz
2	Aiden Waterworks, LLC	Abby Wyatt Group, Inc.
3	Horeb Water Solutions, LLC	Aiden Waterworks, LLC
4	Silver Oak H2O, LLC	Horeb Water Solutions, LLC
5	NS SQ ECO Waters, LLC	Silver Oak H2O, LLC
6	JK Seven LLC	NS SQ ECO Waters, LLC
7	Jeffrey Brooke	JK Seven LLC
8	Oed Properties LLC	Jeffrey Brooke
9	JLE Enterprises, LLC	Oed Properties LLC
10	Be of Service, LLC	JLE Enterprises, LLC
11	Etania, LLC	Be of Service, LLC
12	Nira Enterprises, LLC	Etania, LLC
13	Facts Property Services, LLC	Nira Enterprises, LLC
14	IMLSunshine, LLC	Facts Property Services, LLC
15	Redwaters, LLC	IMLSunshine, LLC
16	Starter Holdings, LLC	Redwaters, LLC
17	Helmut Giewat	Starter Holdings, LLC
18	May Auerbach	Helmut Giewat
19	Royal Reservoirs, LLC	May Auerbach
20	Aqualux Water, LLC	Royal Reservoirs, LLC
21	RCWSTECH1157, LLC	Aqualux Water LLC
22	COLEWSTECH, LLC	RCWSTECH1157, LLC
23	Maji 8377, LLC	COLEWSTECH, LLC
24	Oaks Waterstation Tech, LLC	Maji 8377, LLC
25	SDB H20, LLC	Oaks Waterstation Tech, LLC
26	Half Full Vending, LLC	SDB H20, LLC
27	RDWSTECH3594, LLC	Half Full Vending, LLC
	Rose Trail Ventures, LLC	RDWSTECH3594, LLC
	Rose Trail Ventures 2, LLC	Rose Trail Ventures, LLC
	Pravin Thakkar Jr.	Rose Trail Ventures 2, LLC
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	Brian Chu, DDS	Abbey Anderson
	Larina Chu	Brian Chu, DDS
	David Schroeder	Larina Chu
	Sarah Schroeder	David Schroeder
	Reginald Franklin	Sarah Schroeder
	Angel Franklin	Reginald Franklin
	Dylan Ross	Angel Franklin
	Taylor Ross	Dylan Ross
	Cody Bishop	Taylor Ross
	David Brown	Cody Bishop
	Karthika Mandyam	David Brown
	David Beranek	Karthika Mandyam

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3	Karl Schoenleber	Radhika Siripireddy
4	James Sartain	Karl Schoenleber
5	Nirupa Keskar	James Sartain
6	John Flack	Nirupa Keskar
7	Trung Nguyen	John Flack
8	Li Liang	Trung Nguyen
9	Tan Quan Nguyen	Li Liang
10	Ashoka Sheanh	Tan Quan Nguyen
11	Mathew Fellows	Ashoka Sheanh
12	Charles Coggins	Mathew Fellows
13	Thomas Wawersich	Charles Coggins
14	Jason Blough	Thomas Wawersich
15	Michele Blough	Jason Blough
16	Karen Lavin	Michele Blough
17	Padma Kandikonda	Karen Lavin
18	Pavan Kandikonda	Padma Kandikonda
19	James Vilt II	Pavan Kandikonda
20	Basant Kumar	James Vilt II
21	Radhika Kamalla	Basant Kumar
22	Marc Hildebrand	Radhika Kamalla
23	Debra Hildebrand	Marc Hildebrand
24	Merrill Stoddard	Debra Hildebrand
25	Danielle Stoddard	Merrill Stoddard
26	Venkita Sharma	Danielle Stoddard
27	Timothy Dailey	Venkita Sharma
	Robert Hoery	Timothy Dailey
	Stefani Hoery	Robert Hoery
	Sean Done	Stefani Hoery
	Anna Done	Sean Done
	Sterling Davis	Anna Done
	Mark Fleming	Sterling Davis
	Stacey Fleming	Mark Fleming
	Bo Yang	Stacey Fleming
	Steven Wells	Bo Yang
	Dustin Braeger	Steven Wells
	Navaneeth Kumar	Dustin Braeger
	William White	Navaneeth Kumar
	Jeannette White	William White
	Jeffrey Brooke	Jeannette White
	Joshua Oed	Jeffrey Brooke
	James Estes	Joshua Oed
	Adria Estes	James Estes
	Michael Bailey	Adria Estes

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5	Jacob Letourneau	Aashish Parekh
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9	Technology	Water Station Management, LLC
10	WST Franchise Systems, LLC	Refreshing USA, LLC
11	Water Station Management, LLC	Summit Management Services, LLC
12	Refreshing USA, LLC	Ideal Property Investments, LLC
13	Summit Management Services, LLC	Refreshing California LLC
14	Ideal Property Investments, LLC	Refreshing Montana LLC
15	Refreshing California LLC	Refreshing Mid-Atlantic, LLC
16	Refreshing Montana, LLC	Refreshing Carolines, LLC
17	Refreshing Mid-Atlantic, LLC	Refreshing Great Lakes, LLC
18	Refreshing Carolines, LLC	Waterstation Finance Company, LLC
19	Refreshing Great Lakes, LLC	Refreshing Georgia, LLC
20	Waterstation Finance Company, LLC	Creative Technologies Florida, LLC
21	Refreshing Georgia, LLC	Refreshing Florida, LLC
22	Creative Technologies Florida, LLC	2129 Andrea Lane LLC
23	Refreshing Florida, LLC	3209 Van Buren LLC
24	2129 Andrea Lane LLC	Ice & Water Vendors, LLC
25	3209 Van Buren LLC	Ideal Industrial Park, LLC
26	Ice & Water Vendors, LLC	Ideal AZ Property Investments, LLC
	Ideal Industrial Park, LLC	K-2 Acquisition, LLC
	Ideal AZ Property Investments, LLC	Emery Development, LLC
	K-2 Acquisition, LLC	Arizona Water Vendors Incorporated
	Emery Development, LLC	WST AZ Properties LLC
	Arizona Water Vendors Incorporated	1118 Virginia Avenue LLC
	WST AZ Properties LLC	11519 South Petropark LLC
	1118 Virginia Avenue LLC	TCR Plumbing, LLC
	11519 South Petropark LLC	3422 W Clarendon Ave LLC
	TCR Plumbing, LLC	1206 Hewitt Ave LLC
	3422 W Clarendon Ave LLC	Waterstation Technology II, LLC
	1206 Hewitt Ave LLC	Pistol, Inc.
	Waterstation Technology II, LLC	Smokey Point Holdings, LLC
	Pistol, Inc.	602 South Meadow, LLC
	Smokey Point Holdings, LLC	
	602 South Meadow, LLC	

1 **Pure Water Vending LLC v. Water Station Management, No 24-2-00583-31**

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8 **Rex Ventures, LLC v. WST Franchise System LLC, No. 24-2-01438-31**

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15 **JRC Real Estate III, LLC v. Water Stations Management, No. 23-2-08864-31**

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21 **Wakanda Ventures, LLC v. Water Station Management, No. 24-2-02919-31**

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James Group Int., LLC v. Water Station Management, No. 23-2-07449-31

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Axial Tilt, LLC, et al. v. Waterstation, LLC; No. 23-2-08829-31

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Emmatoine LLC v. Water Station Management, No. 24-2-01283-31

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1 **Rhino Manufacturing, et al. v. Creative Technologies, No. 24-2-01362-31**

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8 **Paul Martinchuk v. Waterstation, LLC; No. 24-2-03489-31**

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1 **Dennis Demirjian v. Water Station Management et al.; No. 24-2-02346-31**

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14 **Tanushka Water Vending v. Ryan Wear, et al.; Case No. 24-2-02684-31**

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20 DATED this 1st day of August, 2024.22 _____
23 *s/Kathryn Savaria*
24 Kathryn Savaria